

TNRCC FY '95 RCRIS COMPLIANCE MONITORING & ENFORCEMENT LOG (CMEL)

Page 1 of 1

County Harris Region 12

Inspector/Coordinator MAC

TNRCC Permit # 11a

TNRCC # 20486 EPA ID # TX00020800371

Handler Name Lysdell Polymer Corporation (Roxene Road)

Mailing Address P.O. Box 2006 Pasadena TX 77505

Site Address 9802 Fairmont Parkway Pasadena Zip 77505

INSPECTION TYPE: CEI

INSPECTION REASON: 04 = Complaint Investigation

INSPECTION DATE: 1/10/95

INSPECTION TYPE: CEI

INSPECTION REASON: 04 = Complaint Investigation

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INSPECTION TYPE: CEI

INSPECTION REASON: 04 = Complaint Investigation

INSPECTION DATE: 1/10/95

Inspection Dates: 1/10/95
 SEQ # 87674 (begin)
87674 (end)

NOTE: Current Inspection Refers To
 Previous CEI
 of 6/8/94 (Original Inspection END date)

SPL Date: 1/1/95
 SPL Results Rcvd: 1/1/95

1&HW CENTRAL OFFICE USE ONLY:
 CMEL logged in: 1/10/95
 Initial check: 1/10/95
 Returned to FOD: 1/10/95
 Reason: 1/10/95
 RCRIS data entry: 1/10/95
 Quality check: 1/10/95
 Paradox data entry: 1/10/95

* INSPECTION REASON: 04 = Complaint Investigation
06 = Closure Inspection
22 = Report Sampling Results
34 = UIC Inspection
40 = BIF Inspection
46 = DOD Inspection
53 = Multi-Media Inspection
61 = State Fee Bill Inspection

INSPECTION TYPE: CEI
 CEI = Sampling
 SPL = Record Review
 NRB = CME
 CSE = Follow Up
 CDI = Case Development
 OAM = O&M
 *OTH = Other Evaluation Types -
 Must also specify an
 EVALUATION REASON
 Code * →

Facility Status: NH CE-SQG LOG TS LD TRP UNK

AREAS OF EVALUATION: (Circle ALL Areas Evaluated During This Inspection!)

SWR = Generator - Manifest
 GOR = Generator - Other
 GLB = Generator - Land Ban

SWR = TSD - Groundwater
 DCL = TSD - Closure
 DFR = TSD - Financial
 DMR = TSD - Manifest
 DOR = TSD - Other
 DLB = TSD - Land Ban

TMR = Transporter - Manifest
 TOR = Transporter - Other

FEA = Penalties
 WFS = Waste Fees

VIOLATIONS — Please reference instructions on back!

1. STATUS		2. PREVIOUS INSPECTION DATA			3. VIOLATION		4.		RULE CITATION		5. ENFORCEMENT			6. COMPLIANCE STATUS	
NEW (N) SAME (S) RESOLVED (R)	RCRIS VIOLATION SEQUENCE #	INSPCT. TYPE	INSPECTION END DATE	AREA	CLASS	REG TYPE S/F	#	TNRCC STATE RULE	EPA FEDERAL RULE MIRROR PROVISION	P	ESC	TYPE ACTION	DATE ISSUED ENFORCEMENT ACTION	FINAL SCHEDULE DATE	ACTUAL DATE OF COMPLIANCE
N S (R)	27	CEI	6/8/94	SWR	1 2 3	S F	1	335.6 (a)	---			120	7/12/94	10/21/94	8/14/94
N S (R)	28			GOR	1 2 3	S F	2	335.112 (a)(1)	265.113 (b)						
N S (R)	29			GOR	1 2 3	S F	3	335.69 (a)(1)	262.34 (a)(1)						
N S (R)	30			GOR	1 2 3	S F	4	335.69 (b)(1)	262.34 (b)(1)						
N S (R)	31	↓	↓	GLB	1 2 3	S F	5	---	268. (a)(1)			↓	↓	↓	↓
N S R					1 2 3	S F	6								
N S R					1 2 3	S F	7								
N S R					1 2 3	S F	8								

RCRA RECORD CENTER
Infiling Cover Sheet

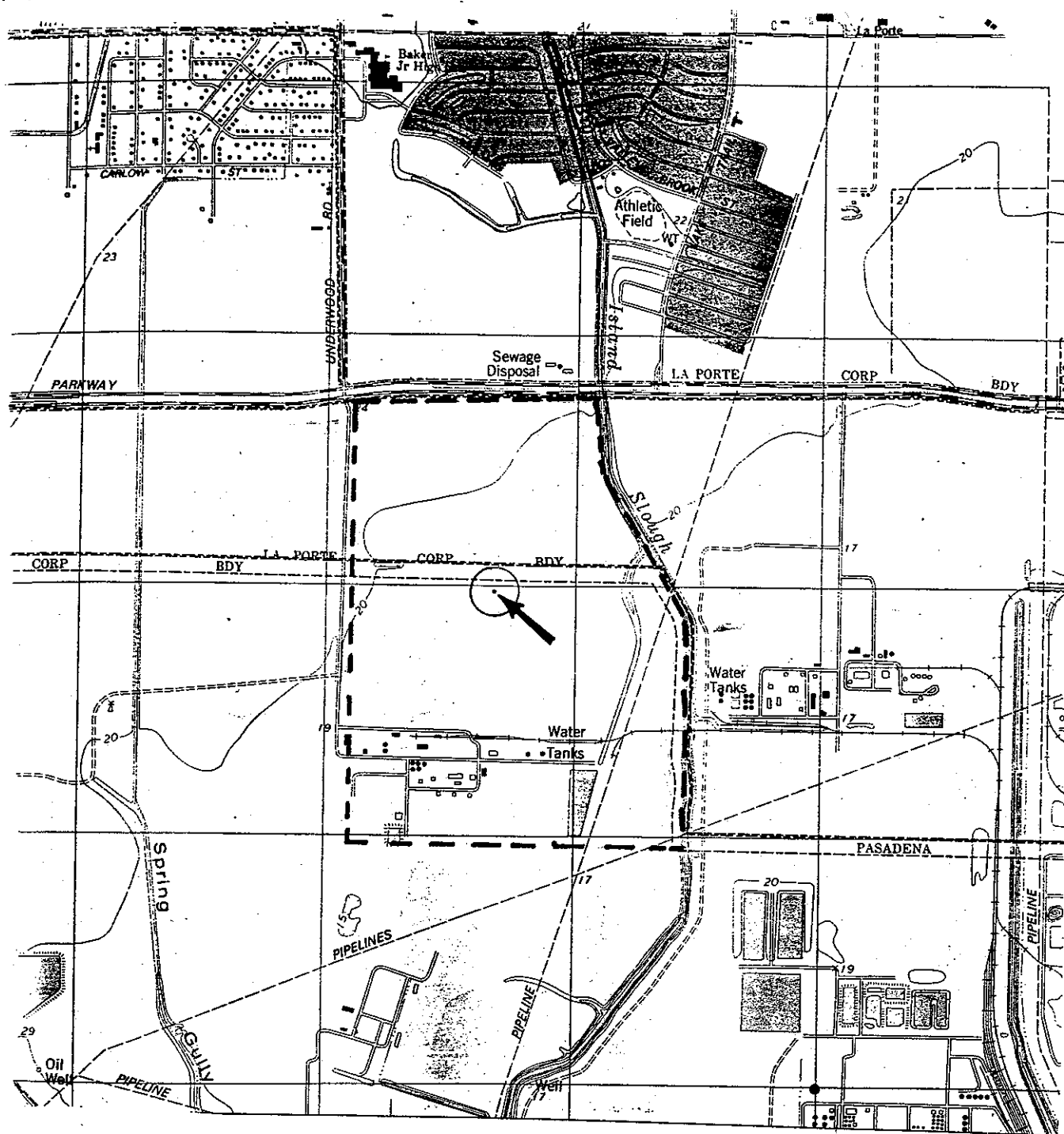
NAME B. Vidar

MAIL CODE 6H-PA

PHONE 8312

DATE 11/15/94

EPA I.D.#	FACILITY NAME	TYPE FILE
TXD020800371	Rayene Products	Permit



1000 0 1000 2000

SCALE: 1 Inch = 2000 Feet



TXD020800371
 REXENE PRODUCTS
 LATITUDE: 29° 38' 39"N
 LONGITUDE: 95° 04' 47"W
 HARRIS COUNTY
 USGS, LA PORTE (1982),
 TEXAS QUADRANGLE

One copy in each file

RCRA RECORD CENTER

Cover Sheet

PA I.D. #	Facility Name	Where to File	Your code	Date	Signature
TXD 058225769	Lyondell Ref	Permit	68897	1/14	Shea
TXD 082 688979	Lyondell - Citygo	"			
TXD 020 800371	Lyondell Polymers	"			

Johnson & Higgins of Texas, Inc.
1400 Three Allen Center
333 Clay Street
Houston Texas 77002-4093
713 651 1900

Telex: 6868728
6868272
Answerback KEROD UW
KEROD UW
Fax: (Main) 713 651 1261

Casualty 713 650 8789
Property 713 650 8789
Marine 713 650 8789
International 713 650 8789
MMB 713 659 5836
Healthcare 713 659 5836



December 30, 1993

William Grimes, Executive Director
Texas Natural Resources Conservation Commission
1700 North Congress Avenue
Austin, Texas 78711-3087

RE: Certificate of Pollution Liability Insurance
Lyondell Petrochemical Company
Lyondell-Citgo Refining Company Ltd.
Lyondell Polymers Corporation

Dear Mr. Grimes:

I enclose the Pollution Liability Certificates for Lyondell Petrochemical Company, Lyondell-Citgo Refining Company Ltd., and Lyondell Polymers Corporation.

Respectfully,

Roger Hermann, CPCU
Vice President

cc: Laurie King - EPA

RH/rhd

- 214 / 655-07

6792

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA., (the "Insurer"), of 70 PINE STREET, NEW YORK, NY 10270 hereby certifies that it has issued liability insurance covering bodily injury and property damage to LYONDELL-CITGO REFINING COMPANY, LTD. (the "Insured") of 1200 LAWDALE STREET, HOUSTON, TX in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (see below) for SUDDEN AND NON SUDDEN ACCIDENTAL OCCURRENCES. The limits of liability are \$4,000,000 each occurrence and \$8,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number 5290944 issued on DECEMBER 31, 1993. The effective date of said policy is DECEMBER 31, 1993.
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - a. Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
 - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - c. Whenever requested by an Executive Director of the Texas Natural Resource Conservation Commission (T.N.R.C.C.), the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.
 - d. Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director of T.N.R.C.C. in which the facility(ies) is(are) located.
 - e. Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director of the T.N.R.C.C.

SCHEDULE

NAME OF FACILITY	ADDRESS OF LOCATION	EPA IDENTIFICATION NUMBER
1. LYONDELL-CITGO REFINING COMPANY, LTD.	1200 LAWNDALE HOUSTON, TX	TXD 082688979
a. East Guard Basin #32		
b. Biox Basin		
c. East Impoundment Basin		
d. West Staging Area		

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess surplus lines insurer, in one or more States.

Christi Gay, Underwriter, for

John K. Welter, Manager, Pollution Legal Liability
Authorized Representative of National Union Fire
Insurance Company of Pittsburgh, PA
1999 Bryan Street, Suite 1700
Dallas, Texas 75201

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA., (the "Insurer"), of 70 PINE STREET, NEW YORK, NY 10270 hereby certifies that it has issued liability insurance covering bodily injury and property damage to LYONDELL PETROCHEMICAL CO. (the "Insured") of 1221 MCKINNEY STREET, SUITE 1600, HOUSTON, TX 77010 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (see below) for SUDDEN AND NON SUDDEN ACCIDENTAL OCCURRENCES. The limits of liability are \$4,000,000 each occurrence and \$8,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number 5290944 issued on DECEMBER 31, 1993. The effective date of said policy is DECEMBER 31, 1993.
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - a. Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
 - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - c. Whenever requested by an Executive Director of the Texas Natural Resource Conservation Commission (T.N.R.C.C.), the Insurer agrees to furnish to the Executive Director a signed duplicate original of the policy and all endorsements.
 - d. Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Executive Director of T.N.R.C.C. in which the facility(ies) is(are) located.
 - e. Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Executive Director of the T.N.R.C.C.

SCHEDULE

NAME OF FACILITY	ADDRESS OF LOCATION	EPA IDENTIFICATION NUMBER
1. LYONDELL PETROCHEMICAL COMPANY	8280 SHELDON RD CHANNELVIEW, TX	TXD 0058275769
a. Tanks 3455, 4455, 2606, 2812, 3110, 3210, 3221, D-59, D-4383, 3207, 1101A, 1101B, D-82, D-83, b. Poly Bd Popcorn Polymer Processing Unit c. Container Storage Area #1 d. OP-I Aeration Basin e. OP-II Aeration Basin f. WWD No. 36		
2. LYONDELL POLYMERS CORPORATION	9802 Fairmont Parkway PASADENA, TX	TXD 020800371
a. 2903 Fouled Xylene Plant b. Hazardous Waste Storage Pad		

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess surplus lines insurer, in one or more States.

Christi Gay, Underwriter, for
 John K. Welter, Manager, Pollution Legal Liability
 Authorized Representative of National Union Fire
 Insurance Company of Pittsburgh, PA
 1999 Bryan Street, Suite 1700
 Dallas, Texas 75201

COPIES OF THIS INSTRUMENT

100-10-04

EP
HAZARDOUS
RCRA P
1994 JAN 12 11 35



**CIGNA Property
& Casualty**
Special Risk Facilities

January 7, 1994

Revised

Suite 1350
1360 Post Oak Boulevard
Houston, TX 77056-3021
Telephone 713.552.5300

Dear Sir/Madam
Record Permit Branch
RCRA
Environment Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733
(214) 655-6444

Re: Non-Renewal of Environmental Impairment Policy

Dear Sir/Madam:

Please be advised that the policy listed below expires effective 12-31-93 and will not be renewed with Pacific Employers Insurance Company at the request of the insured, Lyondell Petrochemical Company.

Policy Number	Effective Dates
PLI 32 12 46	12-31-92 to 12-31-93

The insured has replaced the coverage with the National Union Fire Insurance Company effective 12-31-93.

Please let us know if you have any questions.

Sincerely yours,

Ba Ngo
Senior Account Executive

cc: Donna Fink- CIGNA
Brian Neville-CIGNA

EPA REG
HAZARDOUS
RCRA PERMIT

1994 JAN 13



**CIGNA Property
& Casualty**
Special Risk Facilities

January 6, 1994

Suite 1350
1360 Post Oak Boulevard
Houston, TX 77056-3021
Telephone 713.552.5300

Dear Sir/ Madam
Record Permit Branch
RCRA
Environment Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733
(214) 655-6444

Re: Non-Renewal of Environmental Impairment Policy

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Please be advised that the policy listed below expires effective 12-31-93 and will not be renewed with Pacific Employers Insurance Company at the request of the insured, Lyondell Petrochemical Company.

Policy Number	Effective Dates
PLI 32 12 46	12-31-92 to 12-31-93

The insured has replaced coverage with the Commerce and Industry Insurance Company effective 12-31-93.

Please let us know if you have any questions.

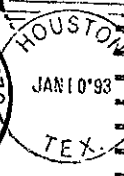
Sincerely yours,

Ba Ngo
Senior Account Executive

cc: Donna Fink-CIGNA
Brian Neville-CIGNA



1360 Post Oak Blvd
Suite 1350
Houston, TX.
77056-3021



Record Permit Branch
RCRA
Environment Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733



Record Permit Branch
RCRA
Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733



1360 Post Oak Blvd
Suite 1350
Houston, TX
77056-3021



Ma ngt
CIGNA Companies

UNIVERSE TRACKING REQUEST

TWC ID: 30486 EPA ID: TXD020800371FACILITY NAME: Rexene Products Co (Lyondell)

✓ ADD: _____ DELETE: _____ CHANGE _____ TO _____
 example: LD, TS, GN LD, TS, LQG LQG SQG
 LQG, SQG SQG LD TS

PROCESS TYPE: _____

(CIRCLE THE APPROPRIATE PROCESS TYPE)

Each code in parenthesis can only be applied
 to the process type that appears with it.

****POSSIBLE** **POSSIBLE** **POSSIBLE**
 PROCESS UNITS OF PROCESS UNITS OF PROCESS UNITS OF
 TYPE MEASURE TYPE MEASURE TYPE MEASURE

D79-WDW (G,L,U,V) (S)1-C (G),L) T01-T (U,V)
 D80-LF (A,F) SO2-T (G,L) T02-SI (U,V)
 D81-LT (B,Q,Y,C) SO3-WP (Y,C) T03-I (D,W,E,H,K)
 D82-OcD (U,V) SO4-SI (G,L) T04-Oth(D,W,U,V,N,S,J,R)
 D83-SI (G,L)

****CODES FOR POSSIBLE UNITS OF MEASURE:**

A=acre-feet L=liters
 B=acres N=short tons per day
 C=cubic meters Q=hectares
 D=short tons per hour R=kilograms per hour
 E=gallons per hour S=metric tons per day
 F=hectare-meter U=gallons per day
 G=gallons V=liters per day
 H=liters per hour W=metric tons per hour
 J=pounds per hour Y=cubic yards
 K=BTU's per hour

Unit IDFAC 03PROCESS/CAPACITY AMOUNT: 37,750**UNIT OF MEASURE USED: G

UNIT STATUS: (CIRCLE)

B - verified as actually existing
 L - determined not to exist as a result of a subsequent investigation
 R - found to exist as a result of a subsequent investigation
 N - permitted, not yet under construction
 C - permitted, under construction
 O - previously operated, regulated. now unregulated

* POSSIBLE SUPERFUND SITE YES NOREQUESTED BY: Jennie Larson DATE: 12/3/93

RCRA RECORD CENTER
Infilling Cover Sheet

NAME Jon Rinehart
PHONE 6789

MAIL CODE 6A-PT
DATE 6-4-93

EPA I.D.#	FACILITY NAME	TYPE FILE
TXD020800371	Lyon Jet Polymer (Roxane)	Permit

Route Slip

☐ As Requested
☒ Circulate
☒ Comment
☒ Prepare Reply

☐ File
☐ For Your Info
☐ Note and Return
☐ See Me

RECEIVED

Name	Initial	Routing	Ext
Trish Brechlin			8319
Ruben Casso			6788
Tim Have			7429
Michelle Peace			7430
Jon Rinehart	✓		6789
Jim Sales			6796
David Vogler			7428
Sharon Butler			6792

Comment:

*Please prepare memo to Enforcement
reopening this site for a 3008 (h).*

by an RFI is necessary include

a copy of the letter if necessary. Send

to the file

Laurel King, Chief

OKlahoma/Texas Section

RCRA Permits Branch

5/11/93

(214) 655-6792

John Hall, Chairman
Pam Reed, Commissioner
Peggy Garner, Commissioner



EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH

TEXAS WATER COMMISSION 1993 MAY 11 PM 4:46

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

May 7, 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William H. Yancey, Principle Engineer
Regulatory Affairs
Lyondell Polymers Corporation (Refene) TXDO2080321
P.O. Box 2006
Pasadena, Texas 77505-1195

Re: Industrial Solid Waste Registration No. 30486
Proposed Hazardous Waste Permit No. HW-50066
Withdrawal of RCRA Permit Application

Dear Mr. Yancey:

The Texas Water Commission (TWC) has reviewed your letter, dated May 3, 1991, requesting that the facility's RCRA Part B permit application be withdrawn. The letter indicates that the facility will be operated under generator status and that Notice of Registration (NOR) Unit Nos. 3 (drum storage area) and 6 (storage tank) will be operated in compliance with the accumulation time exemption found in 31 Texas Administrative Code (TAC) Section 335.69.

By this letter, the TWC is notifying you that the Part A and Part B permit applications for proposed Permit No. HW-50066 have been withdrawn from consideration for permitting but will be retained for our records.

Please be advised that the TWC considers your request for withdrawal from hazardous waste permitting as a statement that interim status is no longer required for your facility. Therefore, the TWC considers interim status terminated for your facility. As a permit has not been issued for the Lyondell Polymers facility, Lyondell Polymers is not authorized to engage in any activity of storage, processing, or disposal requiring a permit under 31 TAC Chapter 335.

Please contact Jesse Chacon at AC512/908-6615 if you have any questions concerning this matter.

Sincerely,

Kai Bouland-Clement for

Minor Brooks Hibbs, Manager
Industrial and Hazardous Waste Permits Section
MBH/JEC/jec

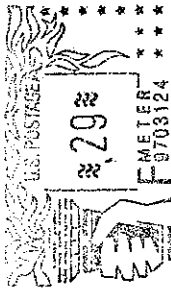
Enclosures

cc: ✓ EPA Region VI Office - Dallas
TWC District 7 Office - Houston



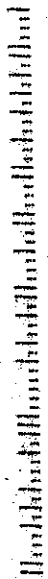
TEXAS WATER COMMISSION
P.O. BOX 13087
CAPITOL STATION
AUSTIN, TEXAS 78711-3087

ADDRESS CORRECTION REQUESTED



Laurie King, Chief
Texas Section
U.S. Environmental Protection Agency
Hazardous Waste Management Division
Region VI - 6H-PT
1445 Ross Avenue
Dallas, Texas 75202-2733

75202-2733-54



RCRA RECORD CENTER

Cover Sheet

EPA I.D. #	Facility Name	Where to file	Your code	Date	Signature
TXD020 800 371	Agondell	II.1.A			B. Vidler

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: _____
Date: _____

Background Facility Information

Facility Name: Agumell
EPA Identification No.: 10020800371
Location (City, State): _____
Facility Priority Rank: 243, 87

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility?
Explain.

entire facility - RFA

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated
☒ RCRA Facility Assessment (RFA) or equivalent completed
☐ RCRA Facility Investigation (RFI) completed
☐ Corrective Measures Study (CMS) completed
☐ Corrective Measures Implementation (CMI) begun or completed
☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
☐ Post-closure permit
☐ Enforcement order

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
☐ No
☒ Uncertain; still underway

CONTINUE TO QUESTION 5 ONLY IF THE FOLLOWING CONDITIONS ARE MET:

- The facility ranks "High" on the National Corrective Action Prioritization System; AND
- Interim Measures have not been initiated, or if initiated, have not been successful in preventing the further spread of contamination at the facility.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☐ Ground water
☐ Surface water
☐ Air
☐ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, concentrations, and level of certainty.
-
-
-

- ☐ No
☐ Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes
☐ No
☐ Uncertain

7b. Is there a potential for human exposure to the contaminants released from the facility over the next five to 10 years?

- ☐ Yes
☐ No
☐ Uncertain

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes
☐ No
☐ Uncertain

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next five to 10 years?

- ☐ Yes
☐ No
☐ Uncertain

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

- ☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

- ☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

- ☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions?

- ☐ Solid
- ☐ Light non-aqueous phase liquids (LNAPLs)
- ☐ Dense non-aqueous phase liquids (DNAPLs)
- ☐ Dissolved in ground water or surface water
- ☐ Gaseous
- ☐ Other _____

13. Are one or more of the following major chemical groupings of concern at the facility?

- ☐ Volatile organic compounds (VOCs) and/or semi-volatiles
- ☐ Polynuclear aromatics (PAHs)
- ☐ Pesticides
- ☐ Polychlorinated biphenyls (PCBs) and/or dioxins
- ☐ Other organics
- ☐ Inorganics and metals
- ☐ Explosives
- ☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

- ☐ Yes; Indicate possible course of action.

- ☐ No; Indicate why stabilization technologies are not appropriate; then go to Question 19.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

- ☐ Yes
- ☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

- ☐ Yes
- ☐ No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

- ☐ Yes
- ☐ No
- ☐ Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

- ☐ Yes
- ☐ No
- ☐ Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☐ Yes
- ☐ No, not feasible
- ☒ No, not required

Explain final decision, using additional sheets if necessary.



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+
TXD020000371

INSTALLATION ADDRESS

REXENE PRODUCTS CO
9802 FAIRMONT PARKWAY
PASADENA , TX 77507
HUGH THIBODEAUX PLT MGR

9802 FAIRMONT PARKWAY
PASADENA , TX 77507

DATA CHANGES

EPA IDENTIFICATION NO. 48R/C101-12

TWC #/C116-6

PREPARER

DATE

TXD02018003711

22

11-19-92

Facility Name/C104=4C

REXEL F PRODUCTS CO

County/C114=3

City/C107=25

ST/C108=2

ZIP/C109=5

Facility Contact Person/C105=30

Ownership Code/C102

Location Address/C110=30

ST Dist/C115=2

City/C111=25

ST/C12=2

ZIP/C112=5

Owner's Name/C. 503=40

GEN TRN TSD UIC

C1105

C1305

Other

Other

Telephone/C113=10

Waste Codes to be added/C2701

Waste Codes to be deleted/C2701

Process Codes- Add - Delete - Change

C1802=13

C1803=1 C1804=1

C1801=3

C1802=13

C1803=1 C1804=1

C1801=3

C1802=13

C1803=1 C1804=1

Other Coding as necessary

Need to change name in FINDS & RCRIS


Entered by: *LA*

Date Entered: 11/22/92

QC: File Code:

RCRA RECORD CENTER

Cover Sheet

EPA I.D. #	Facility Name	Where to file	Your code	Date	Signature
TXD 058 275 769	<i>Jyondell</i> Chancellor	Permit	64PT	9/28	<i>Shunt</i>
TXD 082 688 979	Amotex				
	Pasadena (Bayport)				

One-Houston Center
1221 McKinney, Suite 1600
P.O. Box 3646
Houston, Texas 77253-3646
Telephone 713 652 4579

EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH

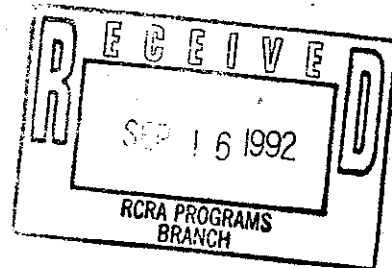


Russell S. Young
Senior Vice-President,
Chief Financial Officer
and Treasurer

1992 SEP 21 PM 1:10

September 8, 1992

Executive Director
Texas Water Commission
Financial Assurance
P.O. Box 13087
Austin, TX 78711-3087



Dear Executive Director:

In prior correspondence with you, beginning on March 26, 1992, we attempted to satisfy our financial assurance obligation by demonstrating that we satisfied either of the Financial Tests and Corporate Guarantees. As we indicated in our telephone conversation with John Racanelli of the Texas Water Commission Financial Assurance Section on September 1, 1992, we have determined that it is in Lyondell's and the TWC's best interest for Lyondell to continue demonstrating financial assurance through the existing Standby Trust and Letter of Credit arrangement. Lyondell made this decision as a result of our July 15, 1992 announcement regarding a proposed venture with CITGO. Having made this determination, it has been necessary to amend the Letter of Credit to increase the amount to our 1992 cost estimates. Such increases are described in more detail below.

Lyondell Petrochemical Company has amended its Irrevocable Standby Letter of Credit No. 42251-S issued by NationsBank for a revised amount of \$13,180,806 effective September 8, 1992. The purpose of this Letter of Credit is to satisfy the requirements for financial assurance for closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265. The standby trust to receive distributions will remain in effect with this Letter of Credit, with NationsBank still acting as trustee.

Attached is an amended Schedule A of the Trust Agreement which documents the closure and post-closure estimates by facility.

The amended Letter of Credit and liability insurance satisfy the requirements for current liability coverage and estimates of closure and/or post-closure costs for the following facilities owned and operated by Lyondell:

EPA I.D. #TXD 058 275 769
Lyondell Petrochemical Company
Channelview Complex
P.O. Box 777
Channelview, Texas 77530

Closure Cost:	\$3,552,083
Post-Closure Cost:	\$ 750,584

EPA I.D. #TXD 082 688 979
Lyondell Petrochemical company
Houston Refinery
P.O. Box 2451
1200 Lawndale Street
Houston, TX 77017

Closure Cost:	\$4,410,590
Post-Closure Cost:	\$3,410,980

EPA I.D. #TXD 020 800 371
Lyondell Polymers Corporation
Bayport Plant
P.O. Box 2006
9802 Fairmont Parkway
Pasadena, Texas 77505

Close Cost:	\$1,056,569
Post-Close Cost:	\$ -0-

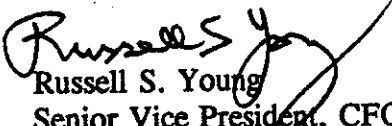

The increase in the cost estimate necessitating the amendment to the Letter of Credit is due to both inflation and the new toxic characteristic leachate procedure (TCLP) now used to determine hazardous waste. These regulations led to increased costs estimates for several of our units as well as the inclusion of some units that had previously not been considered to be hazardous waste units.

Also attached is Schedule A-1, a table showing the breakdown between TCLP and non-TCLP amounts for closure and post-closure cost estimates for all three of our facilities. Included in the non-TCLP closure cost estimate for the Houston Refinery is \$40,250 for the West Staging Area. This information is provided in response to Marilyn Orr's July 9, 1992, letter to Jesus Chagoya at Lyondell.

Please notify us if you require any additional information. Also, please note that a copy of this letter will be attached to Lyondell's response to the Notice of Violation issued by the Commission as of September 1, 1992 to satisfy the Commission's concerns about alleged violations.

It is our understanding that the standby trust and amended Letter of Credit may be terminated upon request after showing alternate financial assurance in conformity with Subpart H of 40 CFR Parts 264 and 265.

Sincerely,


Russell S. Young
Senior Vice President, CFO 
and Treasurer

Attachments

cc:

H. G. Shields, NationsBank
Sonia L. Rolls, TWC
(Enforcement Division)

E.P.A. Regional 6 Administrator

SCHEDULE A

This Schedule A is to the Trust Agreement effective April 30, 1990, as amended, by and between Lyondell Petrochemical Company as Grantor and NationsBank as Trustee.

The facilities and cost estimates with respect to which the aforesaid Trust Agreement is established are as follows:

EPA I.D. #TXD 058 275 769
Lyondell Petrochemical Company
Channelview Complex
P.O. Box 777
5280 Sheldon Road
Channelview, Texas 77530

Closure Cost: \$3,552,083
Post-Closure Cost: \$750,584

EPA I.D. #TXD 082 688 979
Lyondell Petrochemical Company
Houston Refinery
P.O. ox 2451
12000 Lawndale Street
Houston, Texas 77017

Closure Cost: \$4,410,590
Post-Closure Cost: \$3,410,980

EPA I.D. #TXD 020 800 371
Lyondell Polymers Corporation
Bayport Plant
P.O. Box 2006
9802 Fairmont Parkway
Pasadena, Texas 77505

Closure Cost: \$1,056,569
Post-Closure Cost: -0-

SCHEDULE A-1

LYONDELL PETROCHEMICAL COMPANY CLOSURE AND POST-CLOSURE COST ESTIMATES 1992

	<u>CHANNELVIEW COMPLEX</u>	<u>HOUSTON REFINERY *</u>	<u>BAYPORT PLANT</u>	<u>TOTAL LYONDELL</u>
EPA I.D. #	TXD 058 275 769	TXD 082 688 979	TXD 020 800 371	
<u>CLOSURE COSTS:</u>				
NON-TCLP	\$2,417,869	\$395,070	\$1,056,569	\$3,869,508
TCLP	\$1,134,214	\$4,015,520	\$0	\$5,149,734
TOTAL CLOSURE	\$3,552,083	\$4,410,590	\$1,056,569	\$9,019,242
<u>POST-CLOSURE COSTS:</u>				
NON-TCLP	\$0	\$2,500,470	\$0	\$2,500,470
TCLP	\$750,584	\$910,510	\$0	\$1,661,094
TOTAL POST-CLOSURE	\$750,584	\$3,410,980	\$0	\$4,161,564
<u>TOTAL COSTS</u>	\$4,302,667	\$7,821,570	\$1,056,569	\$13,180,806

* The Non-TCLP Closure cost estimate for the Houston Refinery includes \$40,250 for the West Staging Area.



POST OFFICE BOX 3986 • ODESSA, TEXAS 79760 • 915-333-7200

August 8, 1989

Mr. Jim Sales
RCRA Permits Branch
U.S.E.P.A.
Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

TXD 02080037

EPA REGION VI
HAZARDOUS WASTE
COMPLIANCE SECTION

1989 AUG 11 AM 9:32

RECEIVED

Re: RCRA Part B Permit Call for Subpart X Unit

This letter is in response to a letter from your office dated April 12, 1989 requesting a Part B permit application for a miscellaneous treatment unit which might require permitting under 40 CFR Part 26 Subpart X. Rexene feels that the unit referred to is not a Subpart X unit and will not require permitting.

The unit was listed as a miscellaneous thermal treatment unit (T04) on Rexene's original Part A permit application submitted in 1981. Rexene, however, has recently submitted a Part B application and a revised Part A from which this unit has been removed.

This unit is essentially a process flare and consists of several small diameter open-ended pipes (1/2 inch) in a remote area of the plant. Pyrophoric Aluminum Alkyls are periodically vented or purged from the process area through these pipes where they autoignite and burn completely when exposed to air at the end of the pipe.

Again, Rexene feels that this is not a unit which is subject to the permitting requirements of Subpart X, however if you feel this conclusion to be in error, please notify Rexene as soon as possible.

If you have any questions or need additional information concerning this unit, please feel free to contact Dan Smith or myself at (915) 333-8562 or (915) 333-8205, respectively.

Sincerely,

Steve A. Melton

Steve A. Melton
Environmental Regulatory Affairs
REXENE PRODUCTS COMPANY

SAM-096-89

TEXAS WATER COMMISSION

B.117



B. J. Wynne, III, Chairman
John E. Birdwell, Commissioner
Cliff Johnson, Commissioner

John J. Vay, General Counsel
Michael E. Field, Chief Hearings Examiner
Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

July 24, 1990

Anthony Robledo, Chief
Texas Section
Hazardous Waste Management Division
U. S. Environmental Protection Agency
Region VI - 6H-PT
1445 Ross Avenue
Dallas, Texas 75202

Re: Lyondell Polymers - Pasadena
Solid Waste Registration Number 30486
Permit Application Number 50066
EPA I. D. Number TXD020800371

Dear Mr. Robledo:

Enclosed are revisions received on June 8, 1990 to the Part B hazardous waste permit application for the subject facility.

Comments should be addressed to Kyle Shelton at (512) 463-8223.

Sincerely,

Cheryl A. Wilson

Cheryl A. Wilson, Head
Reports and Information Management Unit
Hazardous and Solid Waste Division

BB:ls

Enclosure

cc: Lawrence E. Pewitt, P. E., Permits, Texas Air Control Board,
6330 Highway 290 East, Austin, Texas 78723
Gerald Hord, Manager, Texas Water Commission
District 7 Office - Houston

RECEIVED

1990 JUL 27 PM 2:27

TEXAS WATER COMMISSION
PERMIT APPLICATION
FOR
INDUSTRIAL SOLID WASTE STORAGE/PROCESSING/DISPOSAL FACILITY
PART A—FACILITY BACKGROUND INFORMATION

I. GENERAL INFORMATION

A. Applicant: Lyondell Polymers Corporation
(Individual, Corporation, or Other Legal Entity Name)
Address: 9802 Fairmont Parkway
City: Pasadena State: Texas Zip Code: 77507
Telephone Number: (713)474-3211

B. Authorized Agents

1. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

L. D. Lacy, Site Manager, 9802 Fairmont Parkway, Pasadena, TX 77507, 474-3211

D. L. Foster, Technical Manager, 9802 Fairmont Parkway, Pasadena, TX 77507
474-3211

P. S. Wolfson, Legal Counsel, P. O. Box 3646, Houston, TX 77253-3646

2. List the individual and his/her mailing address that will be responsible for causing any necessary public notices to be published in the newspaper.

Name: L. D. Lacy

Address: 9802 Fairmont Parkway

City: Pasadena State: Texas Zip Code: 77507

Telephone Number: (713)474-3211

3. List the applicant's registered agent for service.

Name: Lyondell Petrochemical Company

Address: P. O. Box 3646

City: Houston State: Texas Zip Code: 77253-3646

Telephone Number: (713)652-7200

- C. Operator: Identify the entity who will conduct facility operations. If same as applicant, state "same as applicant."

Name: Same as applicant

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

D. Ownership

1. Indicate the ownership status of the facility:

a. Private X

- (1) Corporation X
(2) Partnership _____
(3) Proprietorship _____
(4) Non-profit organization _____

b. Public _____

- (1) Federal _____
(2) Military _____
(3) State _____
(4) Regional _____
(5) County _____
(6) Municipal _____

c. Other (specify) _____

2. Is facility and site property owned by applicant?

 X Yes No

If you checked "no",

- a. Submit as an attachment a copy of the lease for use of said facility and/or site property, as appropriate; and
- b. Identify the facility and/or site property owner. If same as applicant in Part A above, state "same as applicant." If different from the applicant, please note that the owner is required to sign the application on page 5.

Name: Same as applicant

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

E. Type of Permit Application:

1. New

2. Amendment X

(TWC Permit Number: HW 50066 Proposed)

F. Registration and Permit Information

1. Denote your TWC Solid Waste Registration Number. If none, state "none." 30486

2. Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the permit number, or the date of application, or "none".

Relevant Program and/or Law

a. Texas Solid Waste Disposal Act

Permit No.

 None

Government
Agency*

(I.G.2. continued)

I, <u>Lewis Darrell Lacy, Jr.</u>	<u>Vice President, Lyondell Polymers</u>
(Name)	(Title)
I, <u>David Leslie Foster</u>	<u>Technical Manager</u>
(Name)	(Title)

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fine.

Signature: *Lewis Darrell Lacy, Jr.*, Date: 6/5/90
Signature: *David Leslie Foster*, Date: 6/5/90

SUBSCRIBED AND SWORN to before me by the said Lewis Darrell Lacy on this 5 day of June, 1990. My commission expires on the 29 day of 9, 1993.

[Signature]
Notary Public in and for
Harris County, Texas

b. Wastewater disposal under the Texas Water Code	<u>02600</u>	<u>TWC</u>
c. Underground injection under the Texas Water Code	<u>None</u>	<u></u>
d. Texas Clean Air Act	<u>R-3126A, R-4157A</u>	<u>TACB</u>
e. Texas Uranium Surface Mining & Reclamation Act	<u>None</u>	<u></u>
f. Texas Surface Coal Mining & Reclamation Act	<u>None</u>	<u></u>
g. Hazardous Waste Management program under the Resource Conservation and Recovery Act	<u>TXD-020800371</u>	<u>EPA</u>
h. UIC program under the Safe Drinking Water Act	<u>None</u>	<u></u>
i. NPDES program under the Clean Water Act	<u>TX-0091073</u>	<u>EPA</u>
j. PSD program under the Clean Air Act	<u>None</u>	<u></u>
k. Nonattainment program under the Clean Air Act	<u>None</u>	<u></u>
l. National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act	<u>None</u>	<u></u>
m. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act	<u>None</u>	<u></u>
n. Dredge or fill permits under section 404 of the Clean Water Act	<u>None</u>	<u></u>
o. Other relevant environmental permits	<u>None</u>	<u></u>

*Use the following acronyms for each agency as shown below:

TWC = Texas Water Commission
 TACB = Texas Air Control Board
 TRC = Texas Railroad Commission
 TDH = Texas Department of Health
 TDA = Texas Department of Agriculture
 EPA = U.S. Environmental Protection Agency
 CORPS = U.S. Army Corps of Engineers

G. Description of Business

1. Give a brief description of the nature of your business.

The manufacture of polypropylene and polyethylene (pellets) from propylene and ethylene.

2. List the principal products and/or services which are provided by your plant. Please itemize by Standard Industrial Classification (SIC) codes.

Propylene 2821

Ethylene 2821

II. SITE BACKGROUND INFORMATION

A. Location of Site

1. Facility Name: _____

Street Address, if available: _____

County: _____

2. Give a verbal description of the location of the facility site with respect to known or easily identifiable landmarks.

3. Detail the access routes from the nearest U.S. or State Highway to the facility site.

4. Submit as "Attachment A" a United States Geological Survey (USGS), 7½ minute quadrangle map. Indicate on this map the location of the site and the land use patterns of the areas within 1 mile (1.6 km) of the site boundaries (e.g., residential, commercial, recreational, agricultural, undeveloped, etc.). Each area of land use should be labeled on the map. (Note: if such a map is not available, submit a substitute map such as a State Department of Highways and Public Transportation county map or a city map with sufficient scale to adequately show the site location and surrounding land use patterns. (Submission of an aerial photograph is recommended as it may clarify land use, topography, vegetation, etc., within the vicinity of the site.) This map and accompanying text should include the following information:

- a. existing zoning at the site (if within the territorial limits of a city);
- b. location and distance to nearest residences, schools or other centers of community activity;
- c. location of any utility easements, pipelines, or any underground oil and gas storage areas;

5. a. Submit as "Attachment B" a map indicating the boundaries of all adjacent parcels of land, and a list of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map, sketch or drawing with a scale adequate enough to show the cross-referenced affected landowners.

b. Indicate from what source(s) the names and addresses of persons identified as affected were obtained.

City _____
County _____
School District _____
Water District _____
Abstract Co. _____
Other (specify) _____

6. Enter the geographical coordinates of the site:

Latitude: _____ deg _____ min _____ sec

Longitude: _____ deg _____ min _____ sec

7. Is the facility located on Indian lands? Check one:

☐ Yes ☐ No

B. Legal Description of Site

Submit as "Attachment C" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s).

C. Site Selection Report

The applicant must submit a site selection report with this application which describes the process used to select the proposed site. The report should address how the site complies with the recommendations of the Commission which are outlined in Technical Guideline No. 2. Any deficiencies of the proposed site should be identified by the applicant as well as proposed remedies to correct those deficiencies. The purpose of the report is to inform the public and agency staff that the applicant has selected a site which he believes to be suitable for industrial solid waste management facilities and which meets the standards in Commission rules and guidelines.

D. Public Participation Activities

If a local review committee has been established to facilitate communication between the applicant and the local host community (see Technical Guideline No. 2, II.D.), the applicant should summarize the activities of the committee and submit this summary with the application. Any report completed by the review committee must also be submitted.

III. WASTES AND WASTE MANAGEMENT

A. Waste Generation and Management Activities

Is any hazardous industrial solid waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

☐ Yes ☐ No

If you checked "no," go to Section III.B.2. below.

If you checked "yes," answer the following question.

1. Are you presently registered with TDWR as a solid waste generator?

☐ Yes ☐ No

If you checked "no," contact the Hazardous & Solid Waste Division of TWC in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If you checked "yes," go to Section I of your Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1 below, listing all hazardous wastes and all mixtures containing any hazardous wastes which are presently or proposed to be handled at your facility. (see 40 CFR 261), attaching additional copies as necessary.

In this table, "TWC Sequence Number" refers to the number in the left-hand column in Section I of your Notice of Registration (Note: if you are not registered with TWC, enter "NA" for TWC Sequence Number and TWC Waste Code Number).

For the EPA Hazard Code and EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated) for each waste and/or waste mixture.

Please group the listings of wastes by SIC code, insofar as your processes are designated by SIC codings. Also, within the general SIC code groups, give a brief description of the specific process or operation from which the waste has been generated.

B. Waste Management Facilities Summary

1. For each waste and waste mixture listed in Table III-1 that is stored, processed, and/or disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), provide the summary sheet shown in Table III-2 (Note: Please make copies of Table III-2 and submit the completed set of tables as "Attachment D").
2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

_____ Yes _____ No

If you checked "yes," complete Table III-3 indicating the hazardous industrial solid waste management facility components which were once utilized at your plant site but are no longer in service (i.e., inactive facility components).

If you checked "no," and if no hazardous industrial solid waste is presently or proposed to be stored [for longer than 90 days (see TAC Section 335.69)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. For each facility component indicated in Table III-2 (Attachment D) and Table III-3, complete the following Table III-4 attaching additional copies as necessary. Enter the name of each facility component as specified in the earlier tables.

Give the design capacity of each facility component in any of the units shown. In the case of inactive facilities for which design details are unavailable, an estimate of the design capacity is sufficient.

Please note that each facility component should be described in your own words on the line provided for "verbal description."

4. Provide an estimate of the total weight (lbs) of hazardous industrial solid waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Facilities and Components

1. Submit as "Attachment E" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the overall plant site, depicting the following:
 - a. The approximate boundaries of the site (described in Section II B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed facility component (see Tables III-2 and III-3 for facility components). Each depicted area should be labeled to identify the facility component(s), component status (i.e., active, inactive, or proposed), and area size in acres.
 - b. The overall facility and all surface intake and discharge structures;
 - c. All on-site injection wells where liquids are injected underground;
 - d. All known monitor wells and boreholes within the property boundaries of the overall plant site; and
 - e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
2. Submit as "Attachment F" photographs which clearly delineate all hazardous waste facility structures and storage, processing, and disposal areas, as well as sites of future storage, processing, and disposal areas.

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste

Process (see last column in Table III-1)

TWC Sequence Number of Waste (if assigned)

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

- | | |
|--|---|
| <input type="checkbox"/> Lagoon/Pond (unlined) | <input type="checkbox"/> Landfarm |
| <input type="checkbox"/> Lagoon/Pond (lined) | <input type="checkbox"/> Landspreading Area |
| <input type="checkbox"/> Basin (earthen, above-grade lined) | <input type="checkbox"/> Spray Irrigation Area |
| <input type="checkbox"/> Basin (earthen, above-grade unlined) | <input type="checkbox"/> Flood Irrigation Area |
| <input type="checkbox"/> Basin (earthen, below-grade lined) | <input type="checkbox"/> Septic Tank/Drain Field |
| <input type="checkbox"/> Basin (earthen, below-grade unlined) | <input type="checkbox"/> Injection Well |
| <input type="checkbox"/> Basin (concrete, above-grade lined) | <input type="checkbox"/> Tank (surface storage) |
| <input type="checkbox"/> Basin (concrete, above-grade unlined) | <input type="checkbox"/> Tank (sub-surface storage) |
| <input type="checkbox"/> Basin (concrete, below-grade lined) | <input type="checkbox"/> Tank (surface processing) |
| <input type="checkbox"/> Basin (concrete, below-grade unlined) | <input type="checkbox"/> Tank (sub-surface processing) |
| <input type="checkbox"/> Basin (other) | <input type="checkbox"/> Tank (other) |
| <input type="checkbox"/> Pit (lined) | <input type="checkbox"/> Drum Storage Area |
| <input type="checkbox"/> Pit (unlined) | <input type="checkbox"/> Other Container Storage Area |
| <input type="checkbox"/> Incinerator | <input type="checkbox"/> Other Container Storage Area |
| <input type="checkbox"/> Open Controlled Incineration Area | <input type="checkbox"/> Other Container Storage Area (specify type of
of container_____) |
| <input type="checkbox"/> Boiler (energy-producing) | <input type="checkbox"/> Waste Pile Storage Area |
| <input type="checkbox"/> Landfill (sanitary) | <input type="checkbox"/> Other (specify _____) |
| <input type="checkbox"/> Landfill (surface, open) | |
| <input type="checkbox"/> Landfill (other) | |

Table III-3 Inactive Hazardous Waste Disposal Facility Components

Indicate the inactive facility components which were used for storage/processing/disposal of hazardous wastes or mixtures containing any hazardous waste by entering the number of such facility components in the space provided.

- ___ Lagoon/Pond (unlined)
- ___ Lagoon/Pond (lined)
- ___ Basin (earthen, above-grade lined)
- ___ Basin (earthen, above-grade unlined)
- ___ Basin (earthen, below-grade lined)
- ___ Basin (earthen, below-grade unlined)
- ___ Basin (other)
- ___ Pit (lined)
- ___ Pit (unlined)
- ___ Open Controlled Incineration Area
- ___ Landfill (sanitary)
- ___ Landfill (surface, open)
- ___ Landfill (other)
- ___ Landfarm
- ___ Landspreading Area
- ___ Spray Irrigation Area
- ___ Flood Irrigation Area
- ___ Septic Tank/Drain Field
- ___ Injection Well
- ___ Other (specify) _____
- _____)

Table III-4 Hazardous Waste Facility Components List

Facility Component		TWC Seq. No.	Status		Design Capacity			Number of Years Utilized	Date in Service
Name	Inactive		Active	Proposed	(cu yds)	(gal)	(lbs)		
<div>Verbal Description:</div>									
<div>Verbal Description:</div>									
<div>Verbal Description:</div>									
<div>Verbal Description:</div>									
<div>Verbal Description:</div>									
<div>Verbal Description:</div>									
<div>Verbal Description:</div>									
<div>Verbal Description:</div>									

D. Flow Diagram/Description

Show as "Attachment G" process flow diagrams or step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

IV. INDEX OF ATTACHMENTS

List and index below all attachments to this application and indicate if included or not included:

Item	Mandatory Attachments	Attachment	Included	Not Included
II.A.4	USGS map	A	___	___
II.A.5.a.	Affected landowners	B	___	___
II.B.	Site legal description	C	___	___
III.B.1.	Hazardous waste facility component summary sheets	D	___	___
III.C.1	Facility boundaries and adjacent waters map	E	___	___
III.C.2.	Photographs	F	___	___
III.D.	Process flow diagram/description	G	___	___
Other Attachments as Required				
I.D.2.a.	Lease	___	___	___
III.A.2	Additional generated waste list (Table III-1)	___	___	___
III.B.4.	Additional hazardous waste facility components list (Table III-4)	___	___	___

EXECUTIVE DIRECTOR
TEXAS WATER COMMISSION
ATTN: Hazardous and Solid Waste Division
P.O. Box 13087, Capitol Station
Austin, Texas 78711

FOR DEPARTMENT USE ONLY
Application No. _____
Permit No. _____
Adm. Review By _____
Administratively _____
Complete _____
Copies Sent: _____

INDUSTRIAL HAZARDOUS WASTE PART B PERMIT APPLICATION

Please refer to the Instructions when preparing this application.

I. GENERAL INFORMATION

A. Applicant: Lyondell Polymers Corporation
(Individual, Corporation, or Other Legal Entity Name)
Address: 9802 Fairmont Parkway
City: Pasadena State: Texas Zip Code: 77507
Telephone Number: (713)474-3211

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas. _____
(Charter Number)

- B. 1. List those persons or firms, including a complete mailing address and telephone number, authorized to act for the applicant during the processing of the permit application.
- L. D. Lacy, Site Manager, 9802 Fairmont Parkway, Pasadena, TX 77507
474-3211
- D. L. Foster, Technical Manager, 9802 Fairmont Parkway, Pasadena, TX 775
474-3211
- P. S. Wolfson, Legal Counsel, P. O. Box 3646, Houston, TX 77253-3646
2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.
- Lyondell Petrochemical Company
P. O. Box 3646
Houston, TX 77253-3646
3. List the individual and his/her mailing address that will be responsible for causing notice to be published in the newspaper.
- L. D. Lacy
9802 Fairmont Parkway
Pasadena, TX 77507

C. Facility for Which Application is Submitted: _____

TWC Registration No.: 30486 EPA I.D.No.: TXD020800371

County: Harris

- D. 1. Provide a general description of the portion of the facility covered by this application (schematic or block flow diagram, verbal description, photograph, etc.) Note any changes from the original Part A application.

(See Part A - Attachments)

2. List the facility units covered by this application. List the waste managed in each unit and the rated capacity or size of the unit.

Facility Unit	Waste Type	Rated Capacity
<u>Spent Xylene Tank</u>	<u>Fouled Xylene</u>	<u>42,000 gallons</u>
<u>Drum Storage Area</u>	<u>Misc Hazardous Waste</u>	<u>35,750 gallons</u>
<u>Burn Pit (Rx dump)</u>	<u>PP Reactor Dump</u>	<u>75,000 gallons</u>
<u>Slop Oil Storage Tank</u>	<u>Spent Lube Oil & Flare Stack Condensate</u>	<u>8,400 gallons</u>
<u>Peroxide Neutralization</u>	<u>Spent Peroxides with NaOH</u>	<u>550 gallons</u>
<u>Oil/Water Separator</u>	<u>Oil & Water Sludge</u>	<u>41,200 gallons</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

G. Provide information to update the Part A application.

Not applicable

Part A pages attached:

Part A additional information as follows:

H. Briefly summarize the following elements which are described in detail elsewhere in the application.

1. Adjacent Land Uses (also provide an 8 1/2" x 11" map showing the facility location) A list of the adjacent landowners is attached.

Of these landowners, owners 1, 7, and 6 are currently undeveloped industrial lands all of whom are chemical operations.

2. Flooding Protection (is the facility in the 100-year floodplain?)

X YES NO

All tanks have either dikes of greater than 3 feet or one elevated more than 3 feet. Drum storage area is elevated by 9" above grade plus it has a 4" curb. The open controlled incineration area is no longer in use.

I, Lewis Darrell Lacy, Jr., Vice President, Lyondell Polymers
(Name) (Title)

certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fines.

Signature: Lewis Darrell Lacy Jr Date: 6/5/90

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT.

I _____ hereby designate _____
(Print or Type Name) (Print or Type Name)

as my agent and hereby authorize said agent to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Water Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my agent in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Applicant
or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

SUBSCRIBED AND SWORN to before me by the said

Lewis Darrell Lacy on this 5 day of June, 19 90

My commission expires on the 29 day of September, 19 93

[Signature]
Notary Public in and for

Harris County, Texas

- d. Specified below are the agreements designating primary emergency authority to a specific police and a specific fire department, in cases where more than one police and fire department might respond to an emergency. Also specified below are agreements with any others to provide support to the primary emergency authority:

Police: Harris County Sherrif's Department

Address: 14350 Wallisville Road, Houston, TX 77049

Person Contacted: Captain Ken Berry

Phone: (713)224-6000

455-8050

911

Agreed Arrangements: To provide law enforcement and traffic control in the event of an emergency condition.

Fire: La Porte, Texas Volunteer Fire Department

Address: P.O. Box 1115 La Porte, TX 77571

Person Contacted: Asst. Chief J. C. Dunham

Phone: (713)911

471-2211

Agreed Arrangements: To provide fire suppression in the event of fire.

VII. FINANCIAL ASSURANCE

Appendix number of the Financial Assurance Report _____

A. Closure

1. Cost estimate for closure _____
2. Is a copy of the financial assurance mechanism adopted in compliance with 40 CFR 264.143 provided?

_____ YES _____ NO

If NO, reference the date of the correspondence which transmitted this information to the TWC.

B. Post-Closure (Applicable to Disposal Facilities only)

1. Cost estimate for post-closure _____
2. Is a copy of the financial assurance mechanism adopted in compliance with 40 CFR 264.145 provided?

_____ YES _____ NO

If NO, reference the date of the correspondence which transmitted this information to the TWC.

C. Liability

Is a copy of the insurance policy or other documentation which comprises compliance with the requirements of 40 CFR 264.147 provided?

 X YES _____ NO See attached

If NO, reference the date of the correspondence which transmitted this information to the TWC.



Internal Correspondence

Date: May 23, 1990

Subject: Certificates of Pollution Liability Insurance
for LPC's Hazardous Waste Facilities

From: Myrna L. Cooke
Telephone: 6-1385
Location: AP 4175

To: Eric Silva
OHC-17205

Enclosed are copies of the six Certificates of Insurance filed with the Texas Water Commission by INA on behalf of Lyondell for its hazardous waste facilities. There are two Certificates for each of the following locations, one for sudden and accidental and the other for non-sudden and accidental occurrences:

Location

EPA ID No.

Bayport Plant
Pasadena, TX

TXD 020800371

Channelview Complex
Channelview, TX

TXD 058275769

Houston Refinery
Houston, TX

TXD 082688979

MLC:mnw/eric.mmo



INSURANCE COMPANY OF NORTH AMERICA
GROUP OF INSURANCE COMPANIES

(This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage, limits, terms or conditions of the policies it certifies.)

HAZARDOUS WASTE FACILITY
CERTIFICATE OF POLLUTION LIABILITY INSURANCE

1. INSURANCE COMPANY OF NORTH AMERICA, (the Insurer) of
1600 ARCH STREET, PHILADELPHIA, PA 19103, hereby certifies that it has issued
pollution liability insurance covering bodily injury and property damage to ATLANTIC RICHFIELD COMPANY, ITS
SUBSIDIARIES AND SUBSIDIARIES THEREOF AS NOW OR HEREINAFTER CONSTITUTED INCLUDING
YONDELL PETROCHEMICAL CO. 515 SOUTH FLOWER STREET, LOS ANGELES, CALIFORNIA 90071, in connection
with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

YONDELL POLYMERS CORPORATION
BAYPORT PLANT
9802 FAIRMONT PARKWAY
P.O. BOX 2006
PASADENA, TEXAS 77505
for SUDDEN ACCIDENTAL OCCURRENCE

EPA IDENTIFICATION NO.
TXD 020800371

The limits of liability are \$ 1,000,000 PER OCCURRENCE and \$ 1,000,000 annual aggregate,
exclusive of legal defense costs. The coverage is provided under policy number ISL61077856-6 issued on 1-1-90
The effective date of said policy is 1-1-90.

The insurance hereby certified is either primary or excess insurance, as indicated by "X" for the limits shown:

- ☒ The insurance hereby certified is primary and the Insurer shall not be liable for amounts in excess of
\$ 1,000,000 and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
- ☐ The insurance hereby certified is excess and the Insurer will not be liable for amounts in excess of
\$ _____ and \$ _____ annual aggregate, exclusive of legal defense costs,
in excess of the underlying limits of \$ _____.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
- (b) The primary Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimburse-
ment by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any
deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
- (c) Whenever requested by THE TEXAS WATER COMMISSION (EPA), the Insurer agrees to fur-
nish to THE TEXAS WATER COMMISSION a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the
expiration of sixty (60) days after a copy of such written notice is received by THE TEXAS WATER COMMISSION
in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days
after a copy of such written notice is received by THE TEXAS WATER COMMISSION in which the facility(ies) is
(are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was con-
stituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance
as an excess or surplus lines insurer, in one or more States.

Christopher C. Hyatt
(Signature of authorized representative of Insurer)

CHRISTOPHER C. HYATT

(Type name)

ACCOUNT MANAGER

INSURANCE COMPANY OF NORTH AMERICA

(Title, Authorized Representative of)

(name of Insurer)

3333 WYCHITRE BLVD STE 300 LOS ANGELES CA 90010



**INSURANCE COMPANY OF NORTH AMERICA
GROUP OF INSURANCE COMPANIES**

(This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage, limits, terms or conditions of the policies it certifies.)

**HAZARDOUS WASTE FACILITY
CERTIFICATE OF POLLUTION LIABILITY INSURANCE**

1. INSURANCE COMPANY OF NORTH AMERICA (the Insurer) of
1600 ARCH STREET, PHILADELPHIA, PA 19103, hereby certifies that it has issued
pollution liability insurance covering bodily injury and property damage to ATLANTIC RICHFIELD COMPANY, ITS SUBSIDIARY
AND SUBSIDIARIES THEREOF AS NOW OR HEREINAFTER CONSTITUTED INCLUDING LYONDELL PETROCHEMICAL CO
(the Insured), of 515 SO. FLOWER STREET, LOS ANGELES, CALIFORNIA 90071 in connection
with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

<u>LYONDELL POLYMERS CORPORATION</u>	<u>EPA IDENTIFICATION NO.</u>
<u>RAYPORT PLANT</u>	<u>TXD 020800371</u>
<u>9802 FAIRMONT PARKWAY</u>	
<u>P.O. BOX 2006</u>	
<u>PASADENA, TEXAS 77505</u>	

for CLAIMS ARISING OUT OF NON-SUDDEN ACCIDENTAL OCCURRENCES.

The limits of liability are \$ 3,000,000 ANY ONE CLAIM and \$ 6,000,000 annual aggregate,
exclusive of legal defense costs. The coverage is provided under policy number HDG1077866-9 issued on 1-1-90.
The effective date of said policy is 1-1-90.

The insurance hereby certified is either primary or excess insurance, as indicated by "X" for the limits shown:

- ☒ The insurance hereby certified is primary and the Insurer shall not be liable for amounts in excess of
\$ 3,000,000 , \$ 6,000,000 annual aggregate, exclusive of legal defense costs.
- ☐ The insurance hereby certified is excess and the Insurer will not be liable for amounts in excess of
\$ _____ , \$ _____ annual aggregate, exclusive of legal defense costs,
in excess of the underlying limits of \$ _____.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
- (b) The primary Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
- (c) Whenever requested by THE TEXAS WATER COMMISSION (EPA), the Insurer agrees to furnish to the THE TEXAS WATER COMMISSION signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the THE TEXAS WATER COMMISSION in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the THE TEXAS WATER COMMISSION in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Jane F. Holland
(Signature of authorized representative of Insurer)

ACCOUNT MANAGER

(Title, Authorized Representative of)

3333 WILSHIRE BLVD., STE. 300, LOS ANGELES, CALIFORNIA 90010

(Address of Representative)

JANE F. HOLLAND

(Type name)

INSURANCE COMPANY OF NORTH AMERICA

(Name of Insurer)



INSURANCE COMPANY OF NORTH AMERICA
GROUP OF INSURANCE COMPANIES

(This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage, limits, terms or conditions of the policies it certifies.)

HAZARDOUS WASTE FACILITY
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1600 ARCH STREET, PHILADELPHIA, PA 19103, hereby certifies that it has issued
pollution liability insurance covering bodily injury and property damage to ATLANTIC RICHFIELD COMPANY, ITS SUBSIDIAR
AND SUBSIDIARIES THEREOF AS NOW OR HEREINAFTER CONSTITUTED INCLUDING LYONDELL PETROCHEMICAL
CO. (the Insured), of 515 SO FLOWER STREET, LOS ANGELES, CALIFORNIA 90071, in connection
with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

LYONDELL PETROCHEMICAL COMPANY
CHANNELVIEW COMPLEX
P.O. BOX 777
CHANNELVIEW, TEXAS 77530

EPA IDENTIFICATION NO.
TXD 058275769

for CLAIMS ARISING OUT OF NON-SUDDEN ACCIDENTAL OCCURRENCES

The limits of liability are \$3,000,000 ANY ONE CLAIM and \$6,000,000 annual aggregate,
exclusive of legal defense costs. The coverage is provided under policy number MOG1077866-9 issued on 1-1-90.
The effective date of said policy is 1-1-90.

The insurance hereby certified is either primary or excess insurance, as indicated by "X" for the limits shown:

- ☒ The insurance hereby certified is primary and the Insurer shall not be liable for amounts in excess of
\$ 3,000,000 , \$ 6,000,000 annual aggregate, exclusive of legal defense costs.
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\$ _____ , \$ _____ annual aggregate, exclusive of legal defense costs,
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2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

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- (b) The primary Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimburse-
ment by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any
deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
- (c) Whenever requested THE TEXAS WATER COMMISSION (EPA), the Insurer agrees to fur-
nish to the Regional Administrator for a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the
expiration of sixty (60) days after a copy of such written notice is received by THE TEXAS WATER COMMISSION (s)
in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days
after a copy of such written notice is received by THE TEXAS WATER COMMISSION (s) in which the facility(ies) is
(are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was con-
stituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance
as an excess or surplus lines insurer, in one or more States.

Jane F. Holland
(Signature of authorized representative of Insurer)

JANE F. HOLLAND
(Type name)

ACCOUNT MANAGER
(Title, Authorized Representative of)

INSURANCE COMPANY OF NORTH AMERICA
(name of Insurer)

2222 WILSHIRE BLVD STE 300 LOS ANGELES CA 90010



INSURANCE COMPANY OF NORTH AMERICA
GROUP OF INSURANCE COMPANIES

(This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage, limits, terms or conditions of the policies it certifies.)

HAZARDOUS WASTE FACILITY
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SUBSIDIARIES AND SUBSIDIARIES THEREOF AS NOW OR HEREINAFTER CONSTITUTED INCLUDING
LYONDELL PETROCHEMICAL CO. (the Insured), of 515 SOUTH FLOWER STREET, LOS ANGELES, CALIFORNIA 90071, in connection
with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

LYONDELL PETROCHEMICAL COMPANY

EPA IDENTIFICATION NO.

CHANNELVIEW COMPLEX

TXD 058275769

P.O. BOX 777

CHANNELVIEW, TEXAS 77530

for SUDDEN ACCIDENTAL OCCURRENCES

The limits of liability are \$ 1,000,000 PER OCCURRENCE and \$ 2,000,000 annual aggregate,
exclusive of legal defense costs. The coverage is provided under policy number ISL61077856-6 issued on 1-1-90.
The effective date of said policy is 1-1-90.

The insurance hereby certified is either primary or excess insurance, as indicated by "X" for the limits shown:

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\$ 1,000,000 , \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
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\$ _____ , \$ _____ annual aggregate, exclusive of legal defense costs,
in excess of the underlying limits of \$ _____.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

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- (c) Whenever requested by ~~the Regional Administrator of the EPA Region in which the facility(ies) is (are) located~~ **THE TEXAS WATER COMMISSION** (EPA), the Insurer agrees to furnish to ~~the Regional Administrator~~ **THE TEXAS WATER COMMISSION** a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by ~~the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.~~ **THE TEXAS WATER COMMISSION**
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by ~~the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.~~ **THE TEXAS WATER COMMISSION**

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Christopher C. Hyatt
(Signature of authorized representative of Insurer)

CHRISTOPHER C. HYATT

(Type name)

ACCOUNT MANAGER

(Title, Authorized Representative of)

INSURANCE COMPANY OF NORTH AMERICA

(name of Insurer)



INSURANCE COMPANY OF NORTH AMERICA
GROUP OF INSURANCE COMPANIES

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SUBSIDIARIES AND SUBSIDIARIES THEREOF AS NOW OR HEREINAFTER CONSTITUTED INCLUDING
LYONDELL PETROCHEMICAL CO. 515 SOUTH FLOWER STREET, LOS ANGELES, CALIFORNIA 90071, in connection
with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

LYONDELL PETROCHEMICAL COMPANY EPA IDENTIFICATION NO.
HOUSTON REFINERY TXD 082688979
P.O. BOX 2451
12000 LAWNDALE STREET
HOUSTON, TEXAS 77017
for SUDDEN ACCIDENTAL OCCURRENCES

The limits of liability are \$ 1,000,000 PER OCCURRENCE and \$ 2,000,000 annual aggregate,
exclusive of legal defense costs. The coverage is provided under policy number ISI C1077856-6 issued on 1-1-90
The effective date of said policy is 1-1-90

The insurance hereby certified is either primary or excess insurance, as indicated by "X" for the limits shown:

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\$ 1,000,000 and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
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\$ _____ and \$ _____ annual aggregate, exclusive of legal defense costs,
in excess of the underlying limits of \$ _____

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- (c) Whenever requested by ~~a Regional Administrator of the Environmental Protection Agency (EPA)~~ THE TEXAS WATER COMMISSION, the Insurer agrees to furnish to ~~the Regional Administrator~~ THE TEXAS WATER COMMISSION a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by ~~the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.~~ THE TEXAS WATER COMMISSION
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by ~~the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.~~ THE TEXAS WATER COMMISSION

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.


(Signature of authorized representative of insurer)

CHRISTOPHER C. HYATT

(Type name)

ACCOUNT MANAGER

(Title, Authorized Representative of)

INSURANCE COMPANY OF NORTH AMERICA

(Name of Insurer)

3333 WILSHIRE BLVD STE 100 LOS ANGELES CA 90010

(Address of Representative)



INSURANCE COMPANY OF NORTH AMERICA
GROUP OF INSURANCE COMPANIES

(This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage, limits, terms or conditions of the policies it certifies.)

HAZARDOUS WASTE FACILITY
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pollution liability insurance covering bodily injury and property damage to ATLANTIC RICHFIELD COMPANY, ITS
SUBSIDIARIES AND SUBSIDIARIES THEREOF AS NOW OR HEREINAFTER CONSTITUTED INCLUDING
LYONDELL PETROCHEMICAL CO. 515 SOUTH FLOWER STREET, LOS ANGELES, CALIFORNIA 90071, in connection
with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

LYONDELL PETROCHEMICAL COMPANY EPA IDENTIFICATION NO.
HOUSTON REFINERY TXD 082688979
P.O. BOX 2451
12000 LAWDALE STREET
HOUSTON, TX 77017

for CLAIMS ARISING OUT OF NON-SUDDEN ACCIDENTAL OCCURRENCES

The limits of liability are \$ 3,000,000 PER ANY ONE CLAIM and \$ 6,000,000 annual aggregate,
exclusive of legal defense costs. The coverage is provided under policy number HDG1077866-9 issued on 1-1-90.
The effective date of said policy is 1-1-90.

The insurance hereby certified is either primary or excess insurance, as indicated by "X" for the limits shown:

- ☒ The insurance hereby certified is primary and the Insurer shall not be liable for amounts in excess of
\$ 3,000,000 annual aggregate, exclusive of legal defense costs.
- ☐ The insurance hereby certified is excess and the Insurer will not be liable for amounts in excess of
\$ _____ annual aggregate, exclusive of legal defense costs,
in excess of the underlying limits of \$ _____.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
- (b) The primary Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
- (c) Whenever requested by ~~the Regional Administrator of the EPA~~ THE TEXAS WATER COMMISSION (EPA), the Insurer agrees to furnish to ~~the Regional Administrator~~ THE TEXAS WATER COMMISSION a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by ~~the Regional Administrator of the EPA~~ THE TEXAS WATER COMMISSION in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by ~~the Regional Administrator of the EPA~~ THE TEXAS WATER COMMISSION in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Christopher C. Hyatt
(Signature of authorized representative of insurer)

CHRISTOPHER C. HYATT

(Type name)

ACCOUNT MANAGER

INSURANCE COMPANY OF NORTH AMERICA

(Title, Authorized Representative of)

(Name of Insurer)

Best

TEXAS WATER COMMISSION



B. J. Wynne, III, Chairman
John E. Birdwell, Commissioner
Cliff Johnson, Commissioner

John J. Vay, General Counsel
Michael E. Field, Chief Hearings Examiner
Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

January 25, 1990

Part B

TXD

020800371

Anthony Robledo, Chief
Texas Section
Hazardous Waste Management Division
U. S. Environmental Protection Agency
Region VI - 6H-PT
1445 Ross Avenue
Dallas, Texas 75202

Re: Rexene - Pasadena
Solid Waste Registration Number 30486
Permit Application Number 50066
EPA I. D. Number TXD020800371

Dear Mr. Robledo:

Enclosed is an Administrative Notice of Deficiency Response to the Part B hazardous waste permit application received on January 5, 1990 for the subject facility.

Comments should be addressed to Kyle Shelton at (512) 463-8248.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl A. Wilson".

Cheryl A. Wilson, Head
Reports and Information Management Unit
Hazardous and Solid Waste Division

BB:ls

Enclosure

cc: Lawrence E. Pewitt, P. E., Permits, Texas Air Control Board,
6330 Highway 290 East, Austin, Texas 78723
Gerald Hord, Regional Manager, Texas Water Commission
Southeast Region - Houston



EPA

POST OFFICE BOX 3986 • ODESSA, TEXAS 79760 • 915-333-7200

January 3, 1990

JAN 05 REC'D

Mr. Kyle Shelton
Permits Section
Hazardous and Solid Waste Division
Texas Water Commission
P. O. Box 13087 Capitol Station
Austin, Texas 78711

Re: Pasadena Facility
Administrative Completeness
Industrial Solid Waste Registration No. 30486
Proposed Permit No. HW-50066

Dear Mr. Shelton:

Please find enclosed a correction to the adjacent landowners list which was submitted to the Commission in a letter dated December 21, 1989. The landowners designated M and N were in error and are being changed to reflect the actual owner. An original and five copies of the updated landowners list and a certification page to cover the change are enclosed. The map previously submitted remains unchanged.

If you have any questions or need additional information regarding this matter, please feel free to contact me at 915/333-8205.

Sincerely,

A handwritten signature in cursive script that reads "Steve A. Melton".

S. A. Melton, Specialist
Environmental Regulatory Affairs
REXENE PRODUCTS COMPANY

SAM/sj
(SAM-004-90)

ATTACHMENT B-1

ADJACENT LAND OWNERS

REXENE PRODUCTS COMPANY - BAYPORT FACILITY

1. ATLANTIC RICHFIELD COMPANY (ARCO)
3500 Entex Bldg.
1200 Milam
Houston, Texas 77002
2. SOUTHERN IONICS TEXAS
12901 Bay Park Rd.
Pasadena, Texas 77507
3. HOECHST-CELANESE CHEMICAL GROUP, INC.
1250 W. Mockingbird Lane
Dallas, Texas 75247
4. OXY PETROCHEMICALS, INC.
Five Greenway Plaza, Suite 2500
Houston, Texas 77046
5. ICI AMERICAS, INC.
New Murphy Rd. and Concord Pike
Wilmington, Delaware 19897
6. CHEVRON USA, INC.
P. O. Box 5050
San Ramon, California 94583-0905
- A. EXXON COMPANY, USA
P. O. Box 4160
Houston, Texas 77252-4160
- B. CIRCLE K COMPANY, INC.
Karl Eller
P. O. Box 52085
Phoenix, Arizona 85072-2085
- C. FAIRMONT PARK JOINT VENTURE
C/O GRAY ENTERPRISES
P. O. Box 638
Baytown, Texas
- D. J. P. SERVICE CENTER
J. P. Jackson
P. O. Box 7018
Pasadena, Texas 77508

- E. REID ELEMENTARY SCHOOL
LAPORTE INDEPENDENT SCHOOL DISTRICT
724 S Broadway
LaPorte, Texas 77571
- F. BRYON E. COOPER, JR.
9930 Parkway
LaPorte, Texas 77571
- G. DENNIS M. & ELIZABETH CASTO
9934 Parkway
LaPorte, Texas 77571
- H. MICHAEL J. FISHBECK
9938 Parkway
LaPorte, Texas 77571
- I. ADMIN VETERANS AFFAIRS
2515 Murworth Dr.
Houston, Texas
- J. CROOK JERRY W. & ANNA N.
1041 Fairway
Clovis, New Mexico
- K. GOOD ROBERT A. & VERA M.
9950 Parkway
LaPorte, Texas 77571
- L. FAIRMONT PARK JOINT VENTURE
C/O GRAY ENTERPRISES
P. O. Box 638
Baytown, Texas
- M. Y & Y PROPERTIES
C/O GERALD YATES
4222 Vista
Pasadena, Texas 77504
- N. Y & Y PROPERTIES
C/O GERALD YATES
4222 Vista
Pasadena, Texas 77504

I, L. N. Anderson, Executive Vice President
(Name) (Title)

certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fines.

Sam
MAA Signature: *McCluskey* Date: 1-3-90

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT.

I _____ hereby designate _____
(Print or Type Name) (Print or Type Name)

as my agent and hereby authorize said agent to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Water Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my agent in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Applicant
or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

SUBSCRIBED AND SWORN to before me by the said

L. N. Anderson on this 3rd day of January, 19 90

My commission expires on the 10th day of September, 19 93



CAROLYN J. TRIPP
Notary Public, State of Texas
My Commission Expires 9-10-93

Carolyn J. Tripp
Notary Public in and for

Ector County, Texas

TEXAS WATER COMMISSION

II . Permit

B. J. Wynne, III, Chairman
John E. Birdwell, Commissioner
Cliff Johnson, Commissioner



John J. Vay, General Counsel
Michael E. Field, Chief Hearings Examiner
Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

NOTICE OF RECEIPT OF AN APPLICATION AND DECLARATION OF ADMINISTRATIVE COMPLETENESS

A hazardous waste permit application for:

Rexene Products Company
Pasadena Facility
P.O. Box 3986
Odessa, Texas 79760

Permit Number: HW-50066
ISW Registration: 30486
EPA ID: TXD020800371

RECEIVED
1990 JAN 19 PM 3
H/7/20/89
C/O/11/89

was received by the Texas Water Commission on June 25, 1984 and declared to be administratively complete on December 29, 1989.

Type of Operation: Hazardous Waste Storage and Processing

Location: This industrial solid waste management facility is located at 9802 Fairmont Parkway which is approximately 4 1/2 miles southwest of the intersection of State Highways 225 and 146 in the City of Pasadena, Harris County, Texas.

Remarks: The scope of the application for permit is to authorize hazardous waste storage and processing.

The application will now be subject to technical evaluation by the staff of the Texas Water Commission. Persons should be advised that the application is subject to change based on such evaluation.

The Commission will issue further notice of the application and the terms of any proposed draft permit once the technical evaluation is completed.

Further information concerning the application may be obtained by contacting:

Kyle Shelton
Texas Water Commission
Hazardous and Solid Waste Division
Permits Section
AC512/463-8278

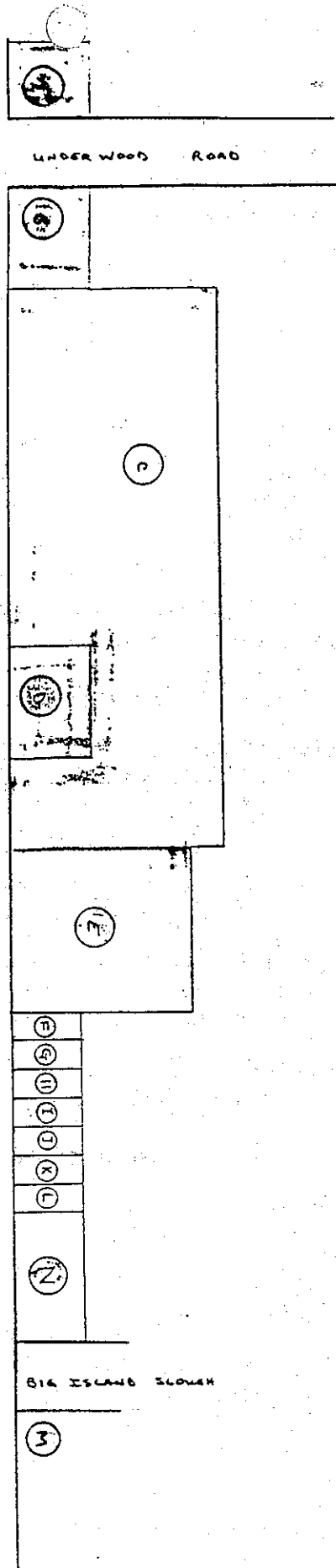
Issued January 17, 1990

Brenda W. Foster

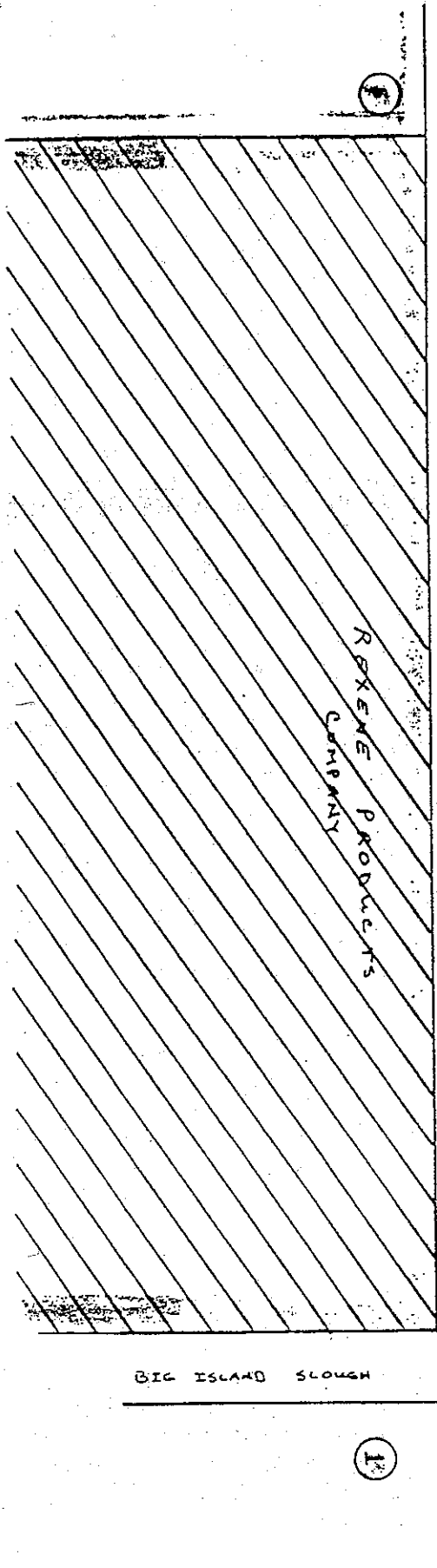
Brenda W. Foster, Chief Clerk
Texas Water Commission

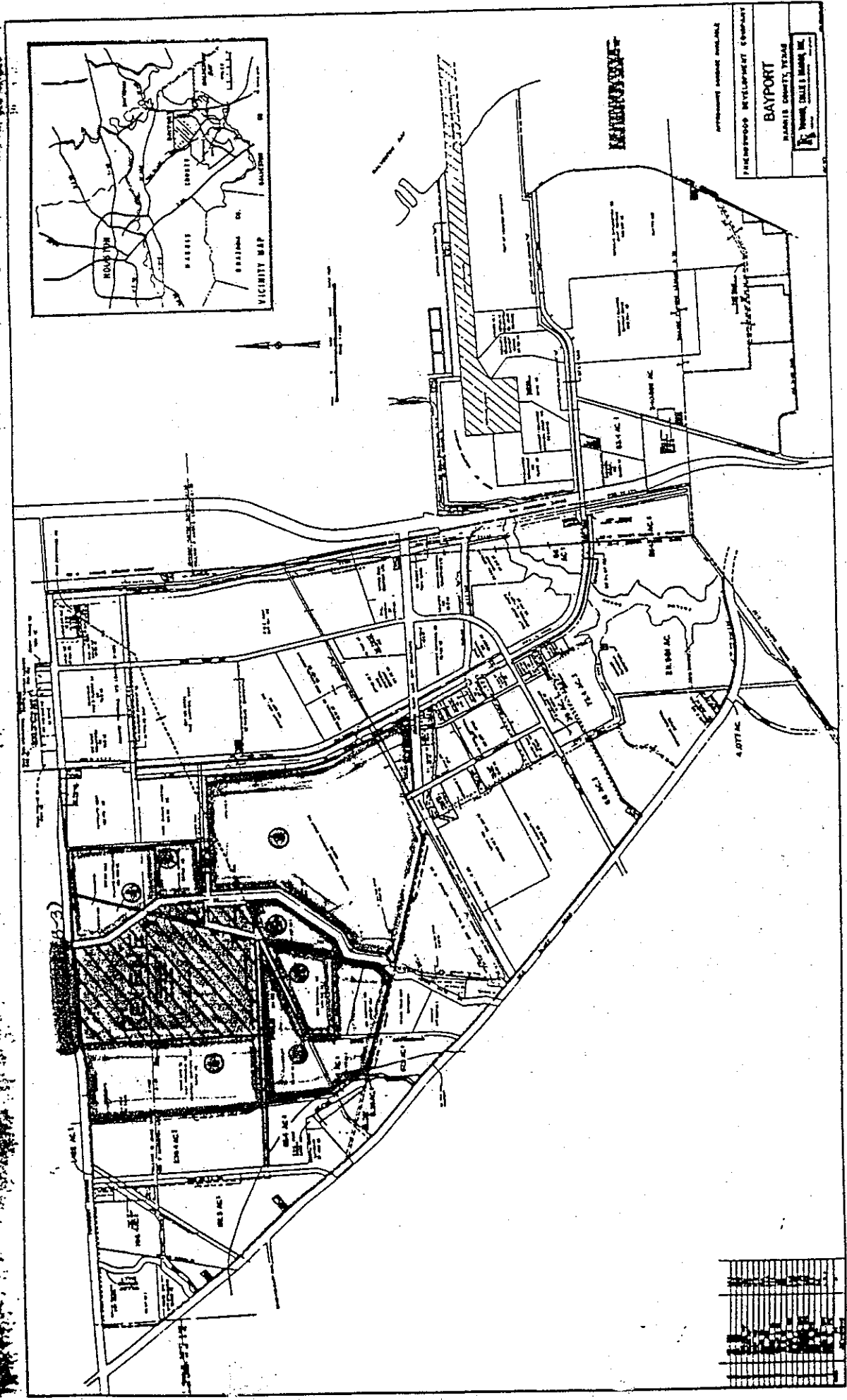
ATTACHMENT B-3

2



LAIRBOY PARKWAY





TEXAS WATER COMMISSION

1. Lowell

2. File

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

January 18, 1989

William K. Honker, Chief
Permits Section
Hazardous Waste Compliance Branch
U. S. Environmental Protection Agency
Region VI - 6H-CP
1445 Ross Avenue
Dallas, Texas 75202

Re: Rexene Products Company
Solid Waste Registration Number 30486
EPA I.D. Number TXD020800371 IV

Dear Mr. Honker:

Enclosed are revisions to the Part B hazardous waste permit application for the subject facility.

Comments should be addressed to the Permit Section at (512) 463-8173.

Sincerely,

A handwritten signature in cursive script, reading "Ken A. Zarker".

Ken A. Zarker, Head
Reports and Information Management Unit
Hazardous and Solid Waste Division

JA:am

Enclosure

RECEIVED
JAN 20 1989
HAZARDOUS
WASTE
COMPLIANCE
SECTION



**EL PASO
PRODUCTS
COMPANY**

30486

November 4, 1988

RECEIVED
1988 JAN 20 14:11:13
Hazardous Waste
Division

Executive Director
Texas Water Commission
P. O. Box 13087 Capitol Station
Austin, Texas 78711

Re: Addendum to Part B Permit Application
Draft Permit HW 50066

Dear Sir:

With this letter Rexene Products Company is submitting an addendum to its original Part B Permit Application submitted in 1985 for our Pasadena facility (N.O.R. 30486). The addendum includes the Section VIII - Releases From Solid Waste Management Units and Corrective Action information required by the Hazardous and Solid Waste Amendments (HSWA) of 1984.

If you have any questions or need additional information concerning the addendum, please feel free to contact me at 915-333-8562.

Sincerely,

D. R. Smith, Director
Environmental Regulatory Affairs

DRS/sj
(DRS-238-88)

TABLE VIII-1A-- SOLID WASTE MANAGEMENT FACILITY UNITS

Verbal Description		Facil. No. (1)	Process Code (2)	Capacity Unit of Measure (3)	Status, Date and Years in Service (4)		Wastes Managed in the Facility Unit		Constituents listed in Appendix VIII 40 CFR 261 contained in the waste		Release		Comments
							Waste Code or Verbal Description				Y	N	
(Surface) Tank		7	T01	2000 gal.	A	/ / 77 11	149820 - Oil & Water		None			X	
Processing					I	/ /							
Oil/Water							Sludge						
Separator					C	/ /							
Skimming Basin		A	D83	270000 gal.	A	/ / 76 12	Uncontaminated Storm		None			X	
					I	/ /	Run-off Water						
					C	/ /							
Clarifier		B	T01	3,150 gal.	A	/ / 76 12	Uncontaminated Storm		None			X	
					I	/ /	Run-off Water						
					C	/ /							
Storm Water Retention Pond		C	T04	5 MM gal.	A	/ / 76 12	Uncontaminated Storm		None			X	
					I	/ /	Run-off Water						
					C	/ /							

TABLE VIII-1A-- SOLID WASTE MANAGEMENT FACILITY UNITS

Verbal Description	Facil. No. (1)	Process Code (2)	Capacity Unit of Measure (3)	Status, Date and Years in Service (4)	Wastes Managed in the Facility Unit			Release Y N	Comments
					Waste Code or Verbal Description	Constituents listed in Appendix VIII 40 CFR 261 contained in the waste			
Fuel Oil Collection Pit	D	T01	4700 gal.	A / /	149820-Oil & Water	None		X	To be closed
				I / / 79	Sludge				
				C / /					
Polyethylene Satellite Storage Area	E	S01	5500 gal.	A / / 88	110490-Oil, Lubricating	None		X	
				I / /					
				C / /					
Polypropylene Satellite Storage Area	F	S01	2200 gal.	A / / 81	110490-Oil, Lubricating	None		X	
				I / /					
				C / /					
Underground Storage Tank	G	T01	375 gal.	A / / 76	110490-Oil, Lubricating	None		X	
				I / /					
				C / /					

TABLE VIII-1A-- SOLID WASTE MANAGEMENT FACILITY UNITS

Verbal Description	Facil. No. (1)	Process Code (2)	Capacity Unit of Measure (3)	Status, Date and Years in Service (4)	Wastes Managed in the Facility Unit			Constituents listed in Appendix VIII 40 CFR 261 contained in the waste		Release		Comments
					Waste Code or Verbal Description			Y	N	Y	N	
Container	H	S01	60 cubic yards	A / /	180970-Atactic Polypro-		None		X			
Storage Area												
"Atactic				I / /	ylene							
Polypropylene												
Dumpster"				C / / 80 4								

TABLE VIII-2--HAZARDOUS WASTE MANAGEMENT FACILITY UNITS

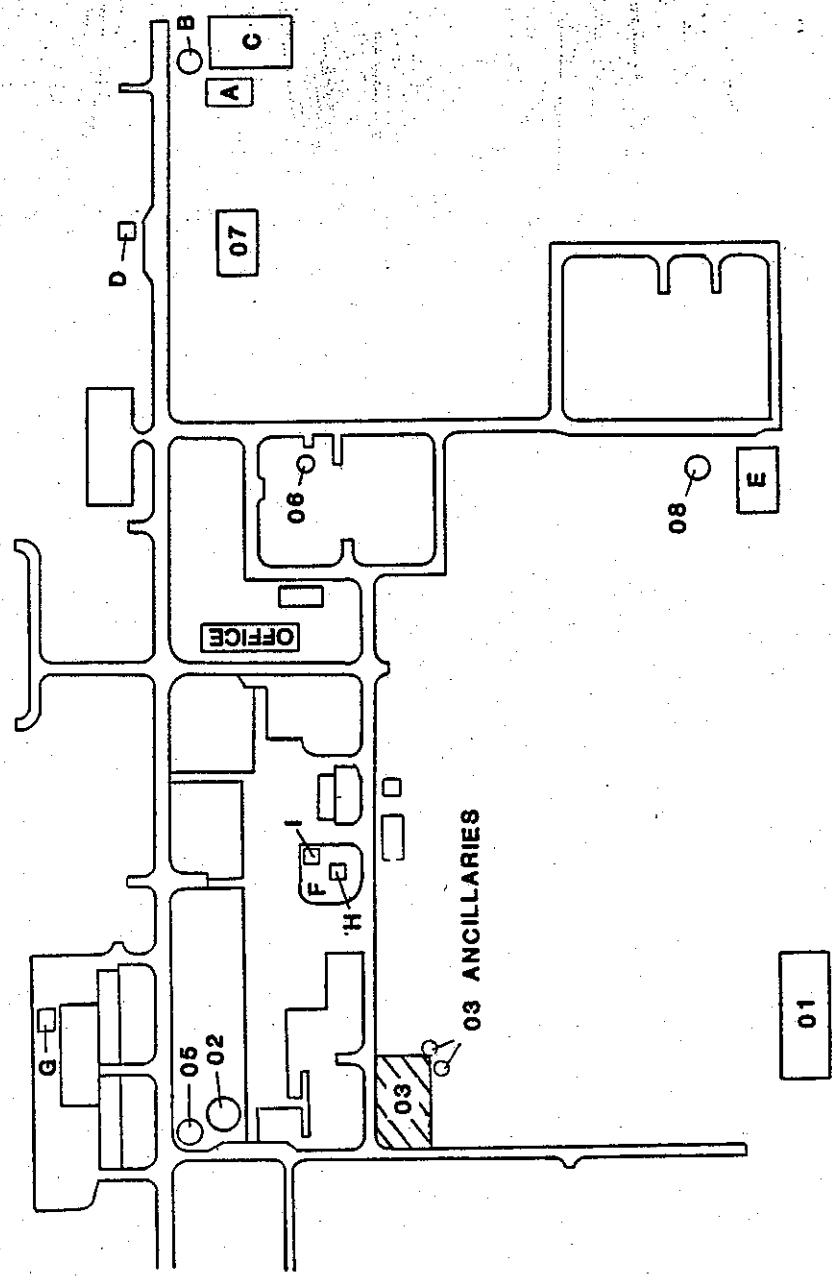
Verbal Description	Facil. No. (1)	Process Code (2)	Capacity Unit of Measure (3)	Status, Date and Years in Service (4)	Wastes Managed in the Facility Unit			Release Y N	Comments
					Waste Code or Verbal Description	Constituents listed in Appendix VIII 40 CFR 261 contained in the waste			
Open Controlled Incineration Area	1	T03	350 gal.	A / /	916000-Sodium in Mineral Oil, 270490-Contaminated Soil, 910620-Isopropyl Alcohol, 910070-Hexane, 109640-Methanol & Water	None		X	
(Surface) Tank Storage/Processing "Fouled Xylene Tank"	2	T01	42000 gal.	A / / 7 6 12	916350-Xylene with Solid Polypropylene	None		X	
Container Storage Area	3	S01	35750 gal. 650 drums	A / / 8 2 6	914740-Ignitable Wastes, 181510- Hydrocarbon Contaminated Absorbent, 910070-Hexane, 949510-Titanium Trichloride in White Mineral Oil, 919150-Laboratory Solvents, 970020-Chromate Bearing Solids, 111050-Esters, Organic (high boiling), 910010-Heptane, 910620-Isopropyl Alcohol, 155260-Hexane, Isopropanol & Polypropylene Solids	Carbon Disulfide, Methylene Chloride, Chromium & Compounds		X	

TABLE VIII-2--HAZARDOUS WASTE MANAGEMENT FACILITY UNITS

Verbal Description	Facil. No. (1)	Process Code (2)	Capacity Unit of Measure (3)	Status, Date and Years in Service (4)	Wastes Managed in the Facility Unit			Release Y	Release N	Comments
					Waste Code or Verbal Description	Constituents listed in Appendix VIII 40 CFR 261 contained in the waste				
Container Storage Area	3				916350-Xylene with Polypropylene Solids,					
"Drum Storage Area" (continued)					970260-Ash of Sodium in Mineral Oil,					
					110490-Lubricating Oil,					
					270960-Dessicant,					
					179740-Dry Paint,					
					280250-Roofing Pitch,					
					152310-Oil Sludge,					
					180440-Grease					
Thermal Processing Unit	4	T04	75000 gal. 40000 lb/hr	A / / 76 12	380380-Polypropylene Wastes,	None			X	
"Reactor Burn Pit"				I / /	949510-Titanium Trichloride (60%) in White Mineral Oil,					
				C / /	111050-Esters, Organic (High Boiling),					
					910010-Heptane,					
					910620-Isopropyl Alcohol,					
					910070-Hexane,					
					916000-Sodium in Mineral Oil					
(Surface) Tank Storage	5	S02	8400 gal.	A / / 76 12	910490-Lubricating Oil	None			X	
"Slop Oil Tank"				I / /	with Hexane,					
				C / /	110490-Lubricating Oil					

TABLE VIII-2--HAZARDOUS WASTE MANAGEMENT FACILITY UNITS

Verbal Description		Facil. No. (1)	Process Code (2)	Capacity Unit of Measure (3)	Status, Date and Years in Service (4)	Wastes Managed in the Facility Unit		Constituents listed in Appendix VIII 40 CFR 261 contained in the waste		Release		Comments
						Waste Code or Verbal Description				Y	N	
(Surface) Tank Processing "Peroxide Neutralization Tank"		6	T01	550 gal.	A / / 78	10	916360-Peroxide, Organic,	None		X		
					I / /		Neutralized with Caustic /					
					C / /		Hexane					
(Surface) Tank Processing "Fouled Naphtha/Xylene Tank"		8	T01	17640 gal.	A / /		950970-Naphtha Sludge	None		X		
					I / /							
					C / / 85	4						
(Surface) Tank Processing "Fouled Naphtha/Xylene Tank"		8	T01	17640 gal.	A / / 88	1	916350-Xylene with Polyethylene	None		X		Re-opened Jan. 88
					I / /							
					C / /							
Container Storage Area "Luwa Pan Area"		1	S01	1650 gal.	A / /		949510-Titanium Trichloride in White Mineral Oil,	None		X		
					I / / 82	3						
					C / /		148870-Titanium Tetrachloride in White Mineral Oil					



0 500 FEET
APPROXIMATE SCALE

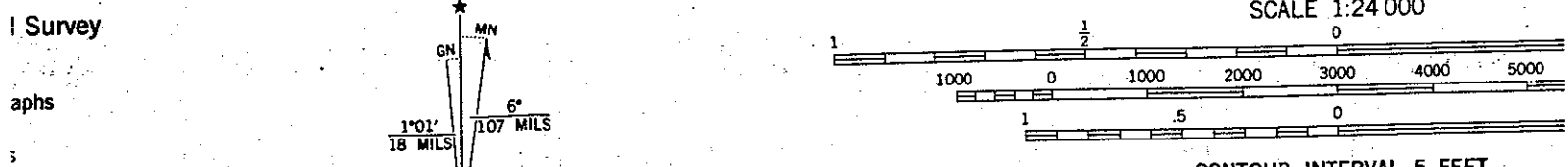
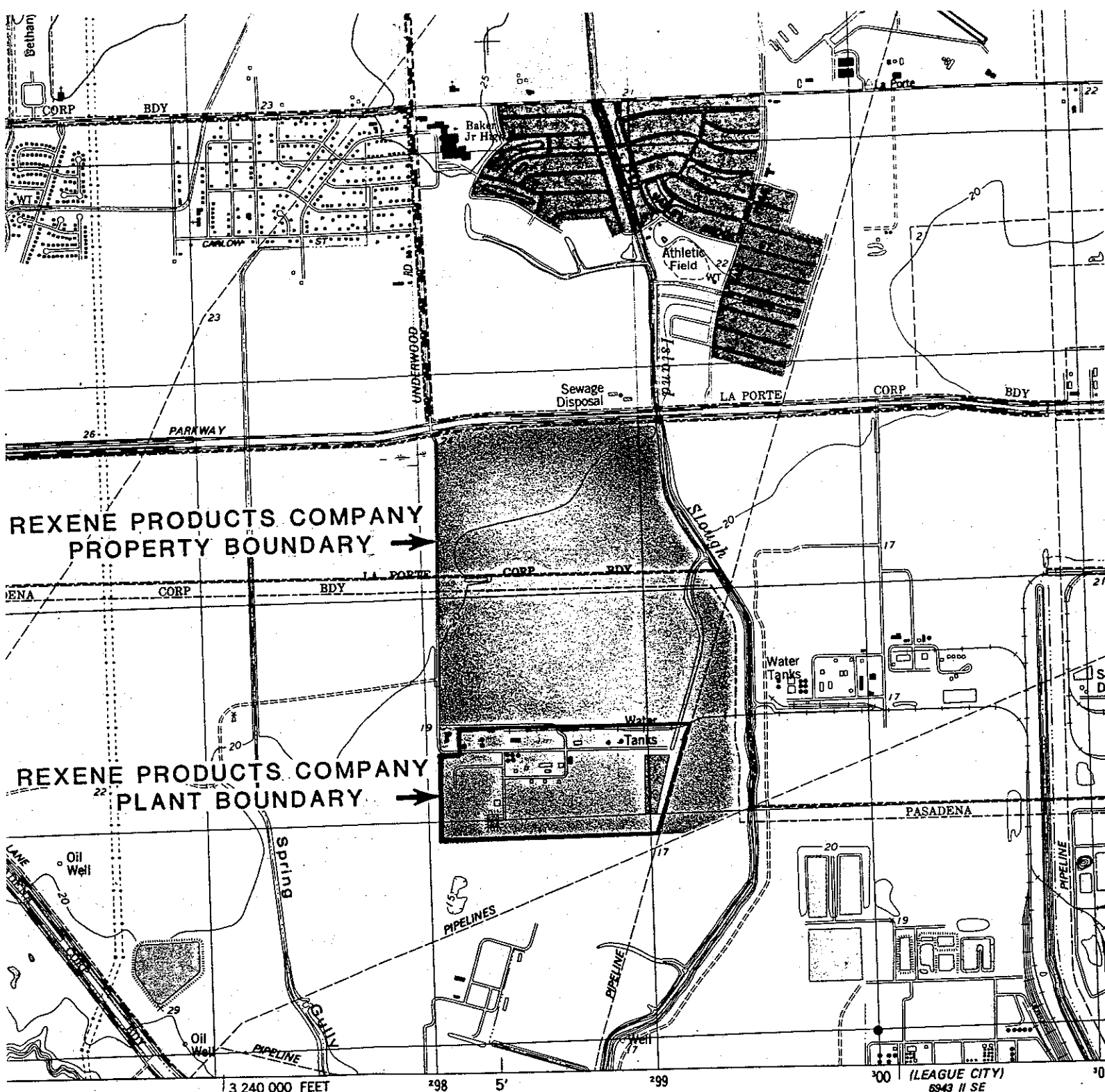
NOTE: SEE FACILITY NUMBER COLUMN ON TABLES VIII-1A AND VIII-2
FOR DESCRIPTION OF NUMERICAL AND ALPHABETICAL CODES.

FACILITY LOCATION MAP BAYPORT PLANT

PREPARED FOR

REXENE PRODUCTS COMPANY
PASADENA, TEXAS





CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
DEPTH CURVES AND SOUNDINGS IN FEET-GULF COAST LOW
SHORELINE SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN
THE MEAN RANGE OF TIDE IS NEGLIGIBLE

A portion of this map lies within a subsidence area
 Contouring based on 1973 adjustment of vertical control
 Water stages in this area vary with meteorological conditions
 Approximate limits of occasional inundation shown by dashed blue lines
 Where mean high water is undetermined for lack of visual evidence
 Dotted blue lines indicate the approximate limits of low water
 There may be private inholdings within the boundaries of

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY S1
 FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225
 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AV.

I, Lavon N. Anderson, Executive Vice President,
(Name) Manufacturing/Technical
(Title)

certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fines.

Signature: *Lavon N. Anderson* Date: November 4, 1988

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT.

I _____ hereby designate _____
(Print or Type Name) (Print or Type Name)

as my agent and hereby authorize said agent to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Water Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my agent in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Applicant
or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

SUBSCRIBED AND SWORN to before me by the said

Lavon N. Anderson on this 4th day of November, 19 88

My commission expires on the 5th day of October, 19 90



NITA SWEEDEN
Notary Public, State of Texas
My Commission Expires 10-5-90

Nita Sweeden
Notary Public in and for

Ector County, Texas

Name Change

DATA CHANGES

IPA IDENTIFICATION NUMBER/C101-12										TMC #/C116-6										PREPARER										DATE									
TXID020866371																				DS										10-5-88									
Facility Name/C104-40																																							
REXENE PRODDUCTS CO																																							
Mailing Address/C106-30																														County/C114-3									
City/C107-25																														Zip/C109-5									
Facility Contact Person/C105-30																														Ownership Code/C102									
Location Address/C110-30																														ST Dist/C115-2									
City/C111-25																														ST/C12-2									
Zip/C113-5																																							
Owner's Name/C1503-40																																							
GEN TRN TSD UIC										C1105										C305										Other									
Waste Codes to be added/C2701																														Waste Codes to be deleted/C2701									
Process Codes - Add - Delete - Change																																							
C1801-3										C1802-13										C1803-1										C1804-1									
C1801-3										C1802-13										C1803-1										C1804-1									
C1801-3										C1802-13										C1803-1										C1804-1									
Other Coding as necessary																																							

Entered by: R.V. Date Entered: 10-11-88 QC: *AA* File Code: *10/2/88*



EL PASO
PRODUCTS
COMPANY

#30486

September 2, 1988



Mr. Ed Hatton
Compliance Assistance Unit
Hazardous and Solid Waste Division
Texas Water Commission
P. O. Box 13087 Capitol Station
Austin, Texas 78711

Re: Company Name Change

Dear Mr. Hatton:

TYD 020 800371

As of September 1, 1988 El Paso Products Company has changed its name to Rexene Products Company. Please make the appropriate change to our Solid Waste Registrations (30142 and 30486) and any other documents which may be affected by the name change. All other information such as addresses and phone numbers will remain the same.

If you have any questions or need additional information concerning this change, please call me at 915-333-8205.

Sincerely,

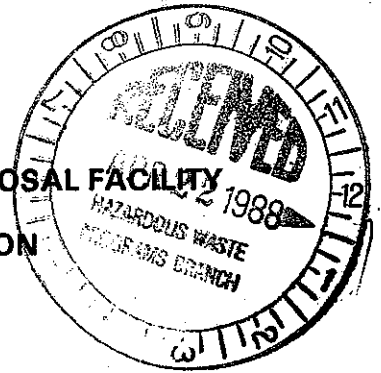
S. A. Melton, Specialist
Environmental Regulatory Affairs

SAM/sj
(SAM-080-88)

cc: TWC District 10 Office

Processed PERSON 5/24/88 m

TEXAS WATER COMMISSION
PERMIT APPLICATION
FOR
INDUSTRIAL SOLID WASTE STORAGE/PROCESSING/DISPOSAL FACILITY
PART A—FACILITY BACKGROUND INFORMATION



I. GENERAL INFORMATION

A. Applicant: El Paso Products Company
(Individual, Corporation, or Other Legal Entity Name)
Address: P. O. Box 3986
City: Odessa State: Texas Zip Code: 79760
Telephone Number: _____

B. Authorized Agents

1. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

2. List the individual and his/her mailing address that will be responsible for causing any necessary public notices to be published in the newspaper.

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Telephone Number: _____

3. List the applicant's registered agent for service.

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Telephone Number: _____

- C. Operator: Identify the entity who will conduct facility operations. If same as applicant, state "same as applicant."

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Telephone Number: _____

D. Ownership

1. Indicate the ownership status of the facility:

a. Private _____

- (1) Corporation _____
- (2) Partnership _____
- (3) Proprietorship _____
- (4) Non-profit organization _____

b. Public _____

- (1) Federal _____
- (2) Military _____
- (3) State _____
- (4) Regional _____
- (5) County _____
- (6) Municipal _____

c. Other (specify) _____

2. Is facility *and* site property owned by applicant?

_____ Yes _____ No

If you checked "no",

- a. Submit as an attachment a copy of the lease for use of said facility and/or site property, as appropriate; and
- b. Identify the facility and/or site property owner. If same as applicant in Part A above, state "same as applicant." If different from the applicant, please note that the owner is required to sign the application on page 5.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

E. Type of Permit Application:

- 1. New _____
 - 2. Amendment _____
- (TWC Permit Number: _____)

F. Registration and Permit Information

- 1. Denote your TWC Solid Waste Registration Number. If none, state "none."
- 2. Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the permit number, or the date of application, or "none".

Relevant Program and/or Law

	Permit No.	Government Agency*
--	------------	--------------------

a. Texas Solid Waste Disposal Act

_____	_____
-------	-------

- | | | |
|--|-------|-------|
| b. Wastewater disposal under the Texas Water Code | _____ | _____ |
| c. Underground injection under the Texas Water Code | _____ | _____ |
| d. Texas Clean Air Act | _____ | _____ |
| e. Texas Uranium Surface Mining & Reclamation Act | _____ | _____ |
| f. Texas Surface Coal Mining & Reclamation Act | _____ | _____ |
| g. Hazardous Waste Management program under the Resource Conservation and Recovery Act | _____ | _____ |
| h. UIC program under the Safe Drinking Water Act | _____ | _____ |
| i. NPDES program under the Clean Water Act | _____ | _____ |
| j. PSD program under the Clean Air Act | _____ | _____ |
| k. Nonattainment program under the Clean Air Act | _____ | _____ |
| l. National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act | _____ | _____ |
| m. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act | _____ | _____ |
| n. Dredge or fill permits under section 404 of the Clean Water Act | _____ | _____ |
| o. Other relevant environmental permits | _____ | _____ |

*Use the following acronyms for each agency as shown below:

TWC = Texas Water Commission
 TACB = Texas Air Control Board
 TRC = Texas Railroad Commission
 TDH = Texas Department of Health
 TDA = Texas Department of Agriculture
 EPA = U.S. Environmental Protection Agency
 CORPS = U.S. Army Corps of Engineers

G. Description of Business

1. Give a brief description of the nature of your business.

2. List the principal products and/or services which are provided by your plant. Please itemize by Standard Industrial Classification (SIC) codes.

I, Harry W. Ray (Name) March 21, 1988 (Title)
Harry W. Ray Vice President
(Name) (Title)

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fine.

Signature: Harry W. Ray Date: March 21, 1988
Signature: _____ Date: _____

SUBSCRIBED AND SWORN to before me by the said Harry W. Ray on this 21st day of March,
19 88. My commission expires on the 10th day of Sept., 19 89.



CAROLYN J. TRIPP
Notary Public, State of Texas
My Commission Expires 9-10-89

Carolyn J. Tripp
Notary Public in and for
The State of Texas

County, Texas

II. SITE BACKGROUND INFORMATION

A. Location of Site

1. Facility Name: El Paso Products Company - Bayport Polyolefins

Street Address, if available: 9802 Fairmont Parkway Pasadena, Texas 77505

County: Harris

2. Give a verbal description of the location of the facility site with respect to known or easily identifiable landmarks.

3. Detail the access routes from the nearest U.S. or State Highway to the facility site.

4. Submit as "Attachment A" a United States Geological Survey (USGS), 7½ minute quadrangle map. Indicate on this map the location of the site and the land use patterns of the areas within 1 mile (1.6 km) of the site boundaries (e.g., residential, commercial, recreational, agricultural, undeveloped, etc.). Each area of land use should be labeled on the map. (Note: if such a map is not available, submit a substitute map such as a State Department of Highways and Public Transportation county map or a city map with sufficient scale to adequately show the site location and surrounding land use patterns. (Submission of an aerial photograph is recommended as it may clarify land use, topography, vegetation, etc., within the vicinity of the site.) This map and accompanying text should include the following information:

- a. existing zoning at the site (if within the territorial limits of a city);
- b. location and distance to nearest residences, schools or other centers of community activity;
- c. location of any utility easements, pipelines, or any underground oil and gas storage areas;

5. a. Submit as "Attachment B" a map indicating the boundaries of all adjacent parcels of land, and a list of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map, sketch or drawing with a scale adequate enough to show the cross-referenced affected landowners.

b. Indicate from what source(s) the names and addresses of persons identified as affected were obtained.

City _____
County _____
School District _____
Water District _____
Abstract Co. _____
Other (specify) _____

6. Enter the geographical coordinates of the site:

Latitude: _____ deg _____ min _____ sec

Longitude: _____ deg _____ min _____ sec

7. Is the facility located on Indian lands? Check one:

☐ Yes ☐ No

B. Legal Description of Site

Submit as "Attachment C" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s).

C. Site Selection Report

The applicant must submit a site selection report with this application which describes the process used to select the proposed site. The report should address how the site complies with the recommendations of the Commission which are outlined in Technical Guideline No. 2. Any deficiencies of the proposed site should be identified by the applicant as well as proposed remedies to correct those deficiencies. The purpose of the report is to inform the public and agency staff that the applicant has selected a site which he believes to be suitable for industrial solid waste management facilities and which meets the standards in Commission rules and guidelines.

D. Public Participation Activities

If a local review committee has been established to facilitate communication between the applicant and the local host community (see Technical Guideline No. 2, II.D.), the applicant should summarize the activities of the committee and submit this summary with the application. Any report completed by the review committee must also be submitted.

III. WASTES AND WASTE MANAGEMENT

A. Waste Generation and Management Activities

Is any hazardous industrial solid waste [see Title 40, Code of Federal Regulations (CFR), Part 261] presently or proposed to be generated or received at your facility?

☐ Yes ☐ No

If you checked "no," go to Section III.B.2. below.

If you checked "yes," answer the following question.

1. Are you presently registered with TDWR as a solid waste generator?

☐ Yes ☐ No

If you checked "no," contact the Hazardous & Solid Waste Division of TWC in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If you checked "yes," go to Section I of your Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1 below, listing all hazardous wastes and all mixtures containing any hazardous wastes which are presently or proposed to be handled at your facility. (see 40 CFR 261), attaching additional copies as necessary.

In this table, "TWC Sequence Number" refers to the number in the left-hand column in Section I of your Notice of Registration (Note: if you are not registered with TWC, enter "NA" for TWC Sequence Number and TWC Waste Code Number).

For the EPA Hazard Code and EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated) for each waste and/or waste mixture.

Please group the listings of wastes by SIC code, insofar as your processes are designated by SIC codings. Also, within the general SIC code groups, give a brief description of the specific process or operation from which the waste has been generated.

B. Waste Management Facilities Summary

1. For each waste and waste mixture listed in Table III-1 that is stored, processed, and/or disposed on-site (except where such storage and/or processing is excluded from permit requirements in accordance with Texas Administrative Code (TAC) Section 335), provide the summary sheet shown in Table III-2 (Note: Please make copies of Table III-2 and submit the completed set of tables as "Attachment D").
2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

_____ Yes _____ No

If you checked "yes," complete Table III-3 indicating the hazardous industrial solid waste management facility components which were once utilized at your plant site but are no longer in service (i.e., inactive facility components).

If you checked "no," and if no hazardous industrial solid waste is presently or proposed to be stored [for longer than 90 days (see TAC Section 335.69)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise proceed with the application form.

3. For each facility component indicated in Table III-2 (Attachment D) and Table III-3, complete the following Table III-4 attaching additional copies as necessary. Enter the name of each facility component as specified in the earlier tables.

Give the design capacity of each facility component in any of the units shown. In the case of inactive facilities for which design details are unavailable, an estimate of the design capacity is sufficient.

Please note that each facility component should be described in your own words on the line provided for "verbal description."

4. Provide an estimate of the total weight (lbs) of hazardous industrial solid waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Facilities and Components

1. Submit as "Attachment E" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the overall plant site, depicting the following:
 - a. The approximate boundaries of the site (described in Section II B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed facility component (see Tables III-2 and III-3 for facility components). Each depicted area should be labeled to identify the facility component(s), component status (i.e., active, inactive, or proposed), and area size in acres.
 - b. The overall facility and all surface intake and discharge structures;
 - c. All on-site injection wells where liquids are injected underground;
 - d. All known monitor wells and boreholes within the property boundaries of the overall plant site; and
 - e. All wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
2. Submit as "Attachment F" photographs which clearly delineate all hazardous waste facility structures and storage, processing, and disposal areas, as well as sites of future storage, processing, and disposal areas.

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste

Process (see last column in Table III-1)

TWC Sequence Number of Waste (if assigned)

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

- | | |
|--|--|
| <input type="checkbox"/> Lagoon/Pond (unlined) | <input type="checkbox"/> Landfarm |
| <input type="checkbox"/> Lagoon/Pond (lined) | <input type="checkbox"/> Landspreading Area |
| <input type="checkbox"/> Basin (earthen, above-grade lined) | <input type="checkbox"/> Spray Irrigation Area |
| <input type="checkbox"/> Basin (earthen, above-grade unlined) | <input type="checkbox"/> Flood Irrigation Area |
| <input type="checkbox"/> Basin (earthen, below-grade lined) | <input type="checkbox"/> Septic Tank/Drain Field |
| <input type="checkbox"/> Basin (earthen, below-grade unlined) | <input type="checkbox"/> Injection Well |
| <input type="checkbox"/> Basin (concrete, above-grade lined) | <input type="checkbox"/> Tank (surface storage) |
| <input type="checkbox"/> Basin (concrete, above-grade unlined) | <input type="checkbox"/> Tank (sub-surface storage) |
| <input type="checkbox"/> Basin (concrete, below-grade lined) | <input type="checkbox"/> Tank (surface processing) |
| <input type="checkbox"/> Basin (concrete, below-grade unlined) | <input type="checkbox"/> Tank (sub-surface processing) |
| <input type="checkbox"/> Basin (other) | <input type="checkbox"/> Tank (other) |
| <input type="checkbox"/> Pit (lined) | <input type="checkbox"/> Drum Storage Area |
| <input type="checkbox"/> Pit (unlined) | <input type="checkbox"/> Other Container Storage Area |
| <input type="checkbox"/> Incinerator | <input type="checkbox"/> Other Container Storage Area |
| <input type="checkbox"/> Open Controlled Incineration Area | <input type="checkbox"/> Other Container Storage Area (specify type of container _____) |
| <input type="checkbox"/> Boiler (energy-producing) | <input type="checkbox"/> Waste Pile Storage Area |
| <input type="checkbox"/> Landfill (sanitary) | <input type="checkbox"/> Other (specify _____) |
| <input type="checkbox"/> Landfill (surface, open) | |
| <input type="checkbox"/> Landfill (other) | |

Table III-3 Inactive Hazardous Waste Disposal Facility Components

Indicate the inactive facility components which were used for storage/processing/disposal of hazardous wastes or mixtures containing any hazardous waste by entering the number of such facility components in the space provided.

- ___ Lagoon/Pond (unlined)
- ___ Lagoon/Pond (lined)
- ___ Basin (earthen, above-grade lined)
- ___ Basin (earthen, above-grade unlined)
- ___ Basin (earthen, below-grade lined)
- ___ Basin (earthen, below-grade unlined)
- ___ Basin (other)
- ___ Pit (lined)
- ___ Pit (unlined)
- ___ Open Controlled Incineration Area
- ___ Landfill (sanitary)
- ___ Landfill (surface, open)
- ___ Landfill (other)
- ___ Landfarm
- ___ Landspreading Area
- ___ Spray Irrigation Area
- ___ Flood Irrigation Area
- ___ Septic Tank/Drain Field
- ___ Injection Well
- ___ Other (specify) _____
- _____)

Table III-4 Hazardous Waste Facility Components List

Facility Component		TWC	Status		Design Capacity			Number of	Date	
Name	Seq. No.		Inactive	Active	Proposed	(cu yds)	(gal)	(lbs)	Years Utilized	in Service
Verbal Description:										
Verbal Description:										
Verbal Description:										
Verbal Description:										
Verbal Description:										
Verbal Description:										

D. Flow Diagram/Description

Show as "Attachment G" process flow diagrams or step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

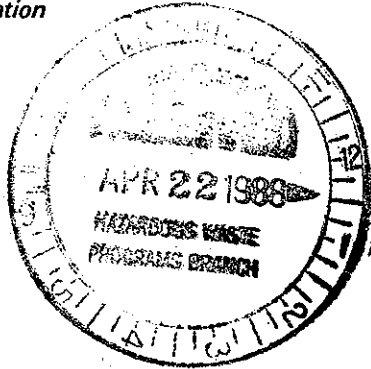
1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

IV. INDEX OF ATTACHMENTS

List and index below all attachments to this application and indicate if included or not included:

Item	Mandatory Attachments	Attachment	Included	Not Included
II.A.4	USGS map	A	___	___
II.A.5.a.	Affected landowners	B	___	___
II.B.	Site legal description	C	___	___
III.B.1.	Hazardous waste facility component summary sheets	D	___	___
III.C.1	Facility boundaries and adjacent waters map	E	___	___
III.C.2.	Photographs	F	___	___
III.D.	Process flow diagram/description	G	___	___
Other Attachments as Required				
I.D.2.a.	Lease	___	___	___
III.A.2	Additional generated waste list (Table III-1)	___	___	___
III.B.4.	Additional hazardous waste facility components list (Table III-4)	___	___	___

EXECUTIVE DIRECTOR
TEXAS WATER COMMISSION
ATTN: Hazardous and Solid Waste Division
P.O. Box 13087, Capitol Station
Austin, Texas 78711



REG No. 30486
TXD 020805371
HW 50066

FOR DEPARTMENT USE ONLY	
Application No.	
Permit No.	
Adm. Review By	
Administratively Complete	
Copies Sent:	

INDUSTRIAL HAZARDOUS WASTE PART B PERMIT APPLICATION

I. GENERAL INFORMATION

A. Applicant: El Paso Products Company
(Individual, Corporation, or Other Legal Entity Name)
Address: P. O. Box 3986
City: Odessa State: Texas Zip Code: 79760
Telephone Number: (915) 333-7200

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas. 00069071-6 (Texas)
(Charter Number)

- B.
1. List those persons or firms, including a complete mailing address and telephone number, authorized to act for the applicant during the processing of the permit application.
 2. If the application is submitted by a corporation or by a person residing out of state, the applicant must designate an Agent in Service or Agent of Service and provide a complete mailing address for the agent. The agent must be a Texas resident.
 3. List the individual and his/her mailing address that will be responsible for causing notice to be published in the newspaper.

C. Facility for Which Application is Submitted: Bayport Polyolefins

TWC Registration No.: 30486 EPA I.D. No.: TXD 020800371

County: Harris

- D. 1. Provide a general description of the portion of the facility *covered by this application* (schematic or block flow diagram, verbal description, photograph etc.) Note any changes from the original Part A application.

2. List the facility components covered by this application. List the waste managed in that component and the rated capacity or size of the unit.

Facility Component	Waste Type	Rated Capacity

- E. For existing disposal facilities provide documentation that a notice has been placed in the property deed or appropriate alternate instrument. If previously submitted, please reference the submittal by date and registration number. Check one:

☐ Proof or recordation in this application as attachment

☐ Proof of recordation previously filed

(Date and Reg. No.)

☐ Not applicable, no disposal on-site

F. Waste Disposition

1. Is the disposal of any waste accomplished by a waste disposal well at this facility?

_____ NO _____ YES (WDW Permit No. _____)

2. Is any point source discharge of effluent or rainfall runoff to occur as a result of the proposed activities?

_____ NO _____ YES

3. If YES, is this discharge regulated by a NPDES or TWC permit?

_____ YES, Permit No. _____ (TWC)
Permit No. _____ (NPDES)

_____ NO, Discharge permit application
filed _____

4. Provide a brief verbal description of the probable routes which any accidentally discharged contaminated water or waste material would follow after leaving the facility. (e.g., into an unnamed creek; thence into Red Creek; thence into the Trinity River).

G. Provide information to update the Part A application.

_____ Not applicable

_____ Part A pages attached: _____

_____ Part A additional information as follows:

H. Briefly summarize the following elements which are described in detail elsewhere in the application.

1. Adjacent Land Uses (also provide an 8½" x 11" map showing the facility location) _____

2. Flooding Protection (is the facility in the 100-year floodplain?) _____ YES _____ NO

Harry W. Ray

Vice President

I, Harry W. Ray (Name) March 31, 1988 (Title)

certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fines.

Signature: Harry W. Ray Date: March 31, 1988

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT.

I _____ hereby designate _____ as my agent
(Print or Type Name) (Print or Type Name)

and hereby authorize said agent to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Water Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my agent in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Applicant
or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

SUBSCRIBED AND SWORN to before me by the said

Harry W. Ray on this 21st day of March, 19 88
My commission expires on the 10th day of September, 19 89



CAROLYN J. TRIPP
Notary Public, State of Texas
My Commission Expires 9-10-89

Carolyn J. Tripp
Notary Public in and for

The State of Texas

County, Texas

ANDREWS & KURTH

ATTORNEYS

TEXAS COMMERCE TOWER

HOUSTON, TEXAS 77002

(713) 220-4200

TELEX: 79-1208

1730 PENNSYLVANIA AVENUE, N.W.

SUITE 700

WASHINGTON, D.C. 20006

(202) 662-2700

4400 THANKSGIVING TOWER

DALLAS, TEXAS 75201

(214) 979-4400

March 21, 1988

**Mr. Ken Zarcker
Hazardous and Solid Waste Division
Texas Water Commission
1700 North Congress Avenue
Austin, Texas 78711-3087**

**Re: Revisions to TWC Permit Nos. 30027 (EPA No. TXD098784309)
and 30486 (EPA No. TXD020800371) from El Paso Polyolefins
Company to El Paso Products Company**

Dear Mr. Zarcker:

El Paso Polyolefins Company has on file with the Texas Water Commission ("TWC") a Part A Hazardous Waste Application for its Odessa East facility (No. 30027) and a Part A and Part B Hazardous Waste Application for its Pasadena facility (No. 30486).

Pursuant to our discussion on March 18, 1988, I am enclosing the following documents so that the TWC can reflect a change of ownership of these facilities on its records:

(1) A revised cover sheet for Part A application No. 30027, which shows that El Paso Products Company is the new owner of the Odessa facility effective March 31, 1988.

(2) A revised cover sheet for the Part A and Part B applications for No. 30486, which show that El Paso Products Company is the new owner of the Pasadena facility effective March 31, 1988.

(3) A letter signed by an officer of El Paso Products Company and El Paso Polyolefins Company which describes the merger that will cause the change of ownership and indicates that both parties agree to the change.

The financial assurances required to operate under these applications were previously submitted to the TWC by El Paso Products Company. Therefore, no change in those records should be necessary. Please let me know prior to March 31 if your records indicate that this is incorrect.

Mr. Ken Zarcker
March 21, 1988
Page -2-

ANDREWS & KURTH

Based on our discussions with your office and with EPA Region VI, I understand that the TWC records show that Generator I.D. Nos. TXD098784309 and TXD020800371 are held by El Paso Products Company, while the EPA records show that they are held by El Paso Polyolefins Company. Please update the Hazardous Waste Data Management System as necessary to reflect that El Paso Products Company will be the owner of the facilities using these Generator I.D. numbers effective March 31, 1988.

Thank you for your assistance on this matter. Please call me at (713) 220-4048 if you have any questions or need any additional information.

Very truly yours,

Tracey L. Smith

Tracey L. Smith

289:dra
Enclosures

cc: ✓ Mr. Lee Haze
U.S. Environmental Protection Agency
1445 Ross
Dallas, Texas 75202

Mr. Daniel R. Smith
El Paso Products Company

Mr. Alan Bethscheider
Gibson, Dunn & Crutcher

4/7/88 Tracey Smith
Ownership

Ken Zarcker